

EXHIBIT "B"

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JARED EDWARDS,)
)
Plaintiff,)
) CASE NO. 2:10-cv-02231 R(RCX)
vs.)
)
KEENEN IVORY WAYANS,)
SHAWN WAYANS, MARLON)
WAYANS, WAYANS BROTHERS)
PRODUCTIONS, AND ST.)
MARTIN'S PRESS, INC.,)
)
Defendants.)
)

DEPOSITION OF JARED EDWARDS

TUESDAY, NOVEMBER 23, 2010

FILE NO. 101123SLO
REPORTED BY: STEFANIE L. OCKER, C.S.R. 10740

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4 JARED EDWARDS,)
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9 KEENEN IVORY WAYANS,)
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17 TUESDAY, NOVEMBER 23, 2010
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1 A Grew up in Los Angeles.

2 Q When did you move to Los Angeles?

3 A Around the age of one, somewhere around there.

4 Q And have you lived in Los Angeles since you were

09:38AM 5 one?

6 A Yes.

7 Q Did you attend a high school?

8 A Yes.

9 Q What high school did you attend?

09:38AM 10 A Inglewood High, Leuzinger High.

11 Q Okay. Which high school did you graduate from?

12 A Inglewood High.

13 Q Did you work while you were in high school?

14 A Yes.

09:38AM 15 Q What were your jobs?

16 A I worked at Pizza Hut --

17 Q Uh-huh.

18 A -- and a towing company called American Tow.

19 Q Okay. And after you graduated, what did you do?

09:39AM 20 MR. THOMPSON: Objection. Vague.

21 BY MS. REA:

22 Q Do you understand the question?

23 A Yes. After high school, I continued to work for
24 the towing company for awhile.

09:39AM 25 Q Okay. About how many years did you work for the

1 A February 2000.

2 Q Had you already met Keenen Ivory Wayans at that
3 time?

4 A Yes, I already known (sic) him.

10:18AM 5 Q Okay. Had you met Marlon Wayans at that time?

6 A I already know (sic) him.

7 Q And did you already know Shawn Wayans at that
8 time?

9 A Yes.

10:18AM 10 Q Did they attend your mother's funeral?

11 A No.

12 Q How did you meet Keenen Ivory Wayans?

13 A On Melrose.

14 Q Melrose, the street?

10:19AM 15 A Uh-huh.

16 Q What were you doing on Melrose?

17 MR. THOMPSON: You've got to answer verbally, Mr.

18 Edwards, okay?

19 THE WITNESS: Yes, Melrose the street.

10:19AM 20 BY MS. REA:

21 Q And what were you doing on Melrose, the street?

22 A Just walking.

23 Q Were you with anybody?

24 A Yes.

10:19AM 25 Q Who were you with?

1 A Physent Walker.

2 Q Okay. And did Keenen approach you or did you
3 approach Keenen?

4 A We approached Keenen.

10:19AM 5 Q You and Mr. Physent together?

6 A Yes.

7 Q Mr. Walker?

8 A Yes.

9 Q Yes. Whose idea was it to approach him?

10:19AM 10 MR. THOMPSON: Objection. Relevance.

11 THE WITNESS: Both of ours.

12 BY MS. REA:

13 Q Did you guys talk about a plan before you went
14 and talked to him?

10:19AM 15 MR. THOMPSON: Objection. Relevance.

16 THE WITNESS: We were already -- yeah. Just say
17 we're going to walk up.

18 BY MS. REA:

19 Q And based on your testimony earlier, is it my
10:20AM 20 understanding that you were doing extra work during this
21 time?

22 A Yes.

23 Q And were you looking to break into any other
24 industries or were you happy with acting?

10:20AM 25 MR. THOMPSON: Objection. Compound.

1 THE WITNESS: Yeah, we wanted to break into the
2 writing and acting. We wanted to do it all.

3 BY MS. REA:

4 Q Okay. Do you remember what -- who spoke to
10:20AM 5 Keenen first?

6 MR. THOMPSON: Objection. Relevance.

7 THE WITNESS: Can't recall.

8 BY MS. REA:

9 Q Do you remember what Keenen said back to you?

10:20AM 10 A Can't recall.

11 Q Do you remember generally what the topic of the
12 conversation was?

13 A About us wanting to write for him, get him the
14 job. We were just trying to find our way in.

10:20AM 15 Q Did you ask for an autograph at that time?

16 A No.

17 Q Was -- what was Keenen doing when you approached
18 him?

19 A Can't recall.

10:21AM 20 Q Was he walking down the street?

21 MR. THOMPSON: Objection. Relevance.

22 THE WITNESS: I -- at the time, we just walked up
23 to him. I don't -- I don't remember him walking.

24 BY MS. REA:

10:21AM 25 Q Do you remember if he was working?

1 BY MS. REA:

2 Q What happened?

3 A We called a woman by the name of Shauna Garr
4 (phonetic).

10:26AM 5 Q Uh-huh. And Keenen told you to call Shauna Garr?

6 A Yes.

7 Q Both you and Mr. Walker?

8 A Yes.

9 Q And who is Shauna Garr?

10:27AM 10 A At the time, she worked for his show.

11 Q What show is that?

12 A Keenen Ivory Wayans Show.

13 Q And what did Shauna Garr tell you?

14 A She told us that she would look into helping us

10:27AM 15 get jobs.

16 Q Did you tell Keenen during that first conversation
17 where you met him that you wanted to be a writer?

18 A I never told him. I don't recall me telling him.

19 Q Okay. After you spoke to Shauna Garr and she

10:27AM 20 told you she would help find you and Mr. Walker jobs, did
21 you at some point start working for the Keenen Ivory Wayans
22 Show?

23 A I didn't right away start working.

24 Q About how long was it between the time that you
10:28AM 25 had that conversation and you started working?

1 A I can't recall exactly how long.

2 Q Do you think it was a week?

3 A It might have been about a -- maybe a month or so
4 for me.

10:28AM 5 Q And during that month, what did you do for your
6 income?

7 A I was living with my mom and still doing extra
8 work.

9 Q Do you know when Mr. Walker started working?

10:28AM 10 A No, I don't.

11 Q What job did you do for the Keenen Ivory Wayans
12 Show when you started working?

13 A P.A.

14 Q What's a P.A.?

10:28AM 15 A Runner; P.A./runner.

16 Q Does P.A. stand for something?

17 A Production assistant.

18 Q And does that mean you work in an office?

19 A Yes, you can.

10:29AM 20 Q Do you work on set?

21 A Yes, you can.

22 Q Do you work on location?

23 A Yes, you can.

24 Q Did you?

10:29AM 25 A I can't recall.

1 Q Do you remember if you worked in an office?

2 A Yes.

3 Q Did you work in an office?

4 A Yes.

10:29AM 5 Q Okay. And did you work on set?

6 A Yes, we had a set.

7 Q Did you work on it?

8 A Yes.

9 Q Okay. What were your duties, generally, during

10:29AM 10 that time?

11 A To assist overall production.

12 Q Who did you report to?

13 A There was a -- several, like, production
14 coordinators.

10:29AM 15 Q Do you remember any of their names?

16 A No.

17 Q How long did you have that job?

18 A Some months; I can't remember exactly how long.

19 Q Do you think it was more than six months?

10:30AM 20 A More or less, could be. I can't recall the exact
21 time period.

22 Q Do you think it was more than a year?

23 A No.

24 Q Do you think it --

10:30AM 25 A No.

1 A I don't recall.

2 Q Was it more than a year?

3 A I don't recall.

4 Q What was your job for the Wayans Brothers?

10:39AM 5 A Start off doing extra work.

6 Q You were an actor?

7 A Background, yes.

8 Q And what were you an extra in?

9 A On their television show.

10:39AM 10 Q What show was that?

11 A Wayans Brothers.

12 Q Okay. And did you do anything else for them?

13 A After extra work, I started doing P.A., production
14 assistant.

10:40AM 15 Q On the same show?

16 A Yes.

17 Q And who did you work with -- who did you report
18 to when you were an extra?

19 A Whoever the stage manager was at that time.

10:40AM 20 Q And then when you were a production assistant,
21 who did you report to?

22 A There was coordinators, several coordinators.

23 Q Did you ever speak with Marlon Wayans when you
24 were doing that show?

10:40AM 25 A Yes.

1 Q Did you speak with Shawn Wayans when you were
2 doing that show?

3 A Yes.

4 Q Did you speak with Keenen Ivory Wayans when you
10:40AM 5 were doing that show?

6 A I can't recall. Keenen wasn't on the show.

7 Q So you spent more time, is it fair to say,
8 talking with Shawn and Marlon than Keenen?

9 A On their show, yes.

10:40AM 10 Q Did you have mutual friends in common with Shawn
11 Wayans?

12 MR. THOMPSON: Objection. Relevance.

13 THE WITNESS: Mutual friends, no.

14 BY MS. REA:

10:41AM 15 Q Was Mr. Walker still working for the Wayans
16 Brothers?

17 A No.

18 Q What was he doing at that time?

19 A Can't recall.

10:41AM 20 Q Were you writing with him?

21 A No.

22 Q Okay. When you were a production assistant on
23 the Wayans Brothers Show, what kind of duties were you
24 tasked with?

10:41AM 25 A Overall assisting on the set, running errands, to

1 help setting up lunch, to doing things on stage, or just
2 overall runs and running errands and things of that
3 nature.

4 Q How long did you do that job?

10:42AM 5 A Until the show was cancelled.

6 Q Do you remember what year that was?

7 A Can't remember the year.

8 Q And after the show was cancelled, what did you do
9 next for your income?

10:42AM 10 A I did freelance gigs, P.A. work.

11 Q Were you still living at home at that time?

12 A Yes.

13 Q Okay. Had you at that point traveled with Marlon
14 Wayans anywhere?

10:42AM 15 A At what point?

16 Q At the point in which the show was cancelled.

17 Prior to the show being cancelled, had you ever gone on
18 any trip with Marlon Wayans?

19 A Trip out --

10:42AM 20 Q Out of the city of Los Angeles.

21 A No.

22 Q Had you ever gone on any trip out of the city of
23 Los Angeles with Shawn Wayans at the time the show was
24 cancelled?

10:43AM 25 A No.

1 Q Could be more than three years?

2 MR. THOMPSON: Objection. Asked and answered
3 over and over --

4 THE WITNESS: I'm not sure.

10:46AM 5 MR. THOMPSON: -- again.

6 BY MS. REA:

7 Q Well, is it possible that it could have been
8 three years?

9 MR. THOMPSON: Objection. Asked and answered.

10:46AM 10 THE WITNESS: Three years from Wayans Brothers
11 till when?

12 BY MS. REA:

13 Q Same question that I've been asking. I'm just
14 trying to get an estimate of when. I know you don't
10:46AM 15 recall exactly the range you think that you were
16 freelancing during that time.

17 A Could have been.

18 Q So it could have been anywhere from a week to
19 three years?

10:46AM 20 A Yes.

21 Q When -- what was your next job after these
22 freelancing P.A. jobs?

23 A Can't really recall.

24 Q Did you freelance on the movie -- any movies that
10:46AM 25 the Wayans Brothers worked on?

1 A Worked on Scary Movie 2 and Little Man.

2 Q Did you work on Scary Movie 1?

3 A No.

4 Q What did you do on Scary Movie 2?

10:47AM 5 A Assistant.

6 Q To who?

7 A Shawn and Marlon.

8 Q Who did you interview with for that job?

9 A I was already working for them.

10:47AM 10 Q So this is not the time in which you were

11 freelancing, this is a different time period?

12 A No, you asked me what movie sets I worked on.

13 Q Correct. When you worked on these movie sets, is
14 this while you were freelancing?

10:47AM 15 A No, I was working for them.

16 Q Okay. Did you work on any movie sets while you
17 were freelancing?

18 A Not that I can recall --

19 Q Did you --

10:47AM 20 A -- no.

21 Q -- work on any television shows while you were
22 freelancing?

23 A Yes.

24 Q Do you remember the names of those shows?

10:48AM 25 A Can't recall.

1 Q Do you remember any studios you visited while you
2 were freelancing?

3 A Can't recall.

4 Q How would you get these freelancing jobs?

10:48AM 5 MR. THOMPSON: Objection. Relevance.

6 THE WITNESS: Call around --

7 BY MS. REA:

8 Q Who --

9 A -- agencies, call around.

10:48AM 10 Q Are you finished? I didn't want to interrupt
11 you.

12 A Yeah, that's it.

13 Q What kind of agencies?

14 A Adecco was one, and just friends, word of mouth.

10:48AM 15 Q So when you say agency in that context, you don't
16 mean talent agency, correct?

17 A Uh-uh.

18 Q Were you getting your checks through Adecco?

19 A Yeah, but I never got any P.A. gigs through them.

10:49AM 20 Q What kind of gigs did you get through Adecco?

21 A Working for Washington Mutual.

22 Q Any others?

23 A That's it.

24 Q What did you do for Washington Mutual?

10:49AM 25 A Filing loans.

1 Q What office did you work in?

2 A It was in -- I can't -- it was like in Irvine
3 somewhere.

4 Q How long were you at Washington Mutual in Irvine
10:49AM 5 through Adecco?

6 MR. THOMPSON: Objection. Relevance.

7 THE WITNESS: Can't remember. It was -- can't
8 remember how long.

9 BY MS. REA:

10:49AM 10 Q Did you work through any other temp agencies?

11 A Signed up with a few, but --

12 Q Do --

13 A -- they were actual agencies for assistant work.

14 Q Do you remember any of the names?

10:50AM 15 A Comar Agency and the Help Agency.

16 Q And were you ever placed through the Comar Agency?

17 A Never placed.

18 Q Were you ever placed through the Help Agency?

19 A Never placed.

10:50AM 20 Q Did you ever receive a check from Comar Agency?

21 A No.

22 Q Did you ever receive a check through the Help
23 Agency?

24 A No.

10:50AM 25 Q So after you did this freelancing, how did you

1 come to work on -- was your next job at Scary Movie 2?

2 A No.

3 Q What was your next job?

4 A After Wayans Brothers?

10:50AM 5 Q The show.

6 A Right.

7 Q Yes.

8 A My -- after the freelancing period --

9 Q Yes.

10:50AM 10 A -- and after the Washington Mutual period, I

11 started working back with them.

12 Q How did that come about?

13 A Mutual -- a friend of their nephew's, Donnell

14 Barrett, gave me a call, and they were looking for a

10:51AM 15 runner. They wanted him to do it, he didn't want to, so

16 he suggested I do it.

17 Q How did you know Mr. Barrett?

18 A Met him on the Keenen show. He worked there

19 also.

10:51AM 20 Q And had you kept in touch with Mr. Barrett since

21 the show was cancelled?

22 A Yes, we became friends.

23 Q So after you received that call from Mr. Barrett,

24 did you contact anyone at Wayans Brothers?

10:51AM 25 A I don't recall. They gave me a call.

1 Q They called you. Did you have to go down
2 anywhere to interview?

3 A No.

4 Q Did you have a phone interview?

10:52AM 5 A Just asked me if I wanted to work.

6 Q And what'd you say?

7 A I said yes.

8 Q And so did you start working?

9 A Yes.

10:52AM 10 Q Immediately?

11 A I believe so, pretty immediate.

12 Q And when you reported to work, what physical
13 location did you go to at that time?

14 A Shawn's house.

10:52AM 15 Q And what tasks did you do?

16 A Get lunches, coffee, and whatever other errands
17 by meeting supplies (sic) and whatever they needed.

18 Q Were you happy to have that job?

19 MR. THOMPSON: Objection. Relevance.

10:52AM 20 THE WITNESS: At the time, yes.

21 BY MS. REA:

22 Q Why?

23 A Because my mom had just died, so it was a moment
24 for me to kind of focus on something else somewhat and --
10:53AM 25 yeah.

1 personal assistant for Shawn Wayans at that time?

2 A At the time I was just the runner, the P.A./runner.

3 Q How many hours a day would say you spent at Shawn
4 Wayans house?

10:54AM 5 A It was open-ended. Hours. It was a lot of
6 hours.

7 Q My husband's an assistant, so I understand it's
8 a -- would you say it's a 24-hour-a-day job?

9 A Always on call.

10:54AM 10 Q Did they give you a cell phone?

11 A No.

12 Q Did you have a cell phone?

13 A Yes.

14 Q Did they use it to call you?

10:54AM 15 A Use -- yeah, they would call me on it, yes.

16 Q And ask you to go do things?

17 A Yes.

18 Q Did you ever spend the night at Shawn's house?

19 A There were times.

10:54AM 20 Q Give me an example of a time when you spent the
21 night at Shawn's house.

22 A I can't recall. It was -- can't recall like the
23 times I did, but I did spend the night over there.

24 Q Were there other people working at Shawn's house
10:55AM 25 around you?

1 A Yes.

2 Q Do you remember any of their names?

3 A Shawn, Marlon, Luom, and -- at what time are you
4 talking about? Are you talking about overall or during
10:55AM 5 this period?

6 Q Just this period where you're working as a runner
7 for Shawn.

8 A In the year 2000?

9 Q Right after your mom passed away.

10:55AM 10 A Right.

11 Q Yes.

12 A At that time, yeah, it was Luom, myself, Shawn,
13 Marlon, Keenen would be there some days, and the writers
14 that they were working with.

10:55AM 15 Q Did you ever travel with Shawn at that time?

16 A In the city or --

17 Q Anywhere outside of L.A.

18 A I traveled with them, yes, during that -- that
19 year.

10:56AM 20 Q Do you remember any of the cities that you went
21 to?

22 A First city was New York.

23 Q Do you remember who went on that trip with you?

24 A Shawn, Marlon, and everyone who worked with them,
10:56AM 25 like hair, makeup, publicist.

1 Q Where did you stay on that trip?

2 A I stayed with Shawn. I believe I stayed with
3 Shawn at that time.

4 Q And it was at a hotel?

10:56AM 5 A Yes.

6 Q Do you remember the name of the hotel?

7 A Can't recall.

8 Q Was it a nice hotel?

9 MR. THOMPSON: Objection. Relevance.

10:57AM 10 THE WITNESS: Yeah, I believe it was the Trump at
11 that time.

12 BY MS. REA:

13 Q And were you working on that trip?

14 A Yes.

10:57AM 15 Q What kind of -- what kinds of tasks did you do on
16 that trip?

17 A Running all ov -- like finding -- getting some --
18 getting clothes, to food, to vitamins, to whatever was
19 needed.

10:57AM 20 Q Did you think you worked too much?

21 A I did, but I didn't, you know -- I figured it was
22 what I needed to do.

23 Q Needed to do, why?

24 A Honestly, I was young and -- I don't know, it was
10:58AM 25 just -- it was a moment (sic) experience. It was like

1 learning, so it was me learning my life and having a job
2 and trying to figure out my own life. I had just lost my
3 mom. I was pretty much just, you know -- anything that
4 would kind of keep me off of that. Personally, I never
10:58AM 5 discussed that with anyone, but that's what it was for me,
6 so --

7 Q How old were you at that time?

8 A I was 24.

9 Q What's the next trip you remember taking with

10:58AM 10 Shawn in 2000? Do you need a break?

11 A No. I can't recall. I can't recall the actual
12 trip after that.

13 Q Do you remember the pur -- purpose of the trip to
14 New York?

10:58AM 15 A They were hosting the MTV Awards.

16 Q Did you get to go to the show?

17 A I was working at the show.

18 Q Did you get to sit in the audience?

19 A No.

10:59AM 20 Q Were you backstage?

21 A Yes.

22 Q Did you get to go to after-parties with them?

23 A Yes.

24 Q How long do you think you did that job for Shawn?

10:59AM 25 A It wasn't just for Shawn, it was for Marlon,

1 everyone who was there.

2 Q Of course. Do you remember any other names?

3 A It was a lot of us, so I think might even -- I
4 can't remember everyone.

11:04AM 5 Q Was Darnell (sic) in that group, Darnell Barrett?

6 A I don't recall Donnell being there.

7 Q Was Mr. Walker there?

8 A No, he wasn't. He didn't hang out with them like
9 that.

11:04AM 10 Q And when -- did the Shawn -- strike that.

11 Did Shawn and Marlon pay for the trip to San
12 Diego?

13 A Yes.

14 Q When were you told that you needed to work that
11:04AM 15 weekend?

16 A When Marlon yelled at me.

17 Q When was that?

18 A When he wanted Karen Tinsler (phonetic) to hurry
19 up. She was taking too long and he wanted me to go get
11:05AM 20 her.

21 Q Where were you when that took place physically?

22 A On the tour bus.

23 Q Were you asleep?

24 A At the time, I was getting ready.

11:05AM 25 Q And what was Shawn doing?

1 A I can't recall.

2 Q What was Marlon doing?

3 A Yelling at me.

4 Q What was he doing right before he yelled at you?

11:05AM 5 A I can't recall.

6 Q Was there anybody else on the tour bus with you
7 and Marlon?

8 A Everyone was there.

9 Q Did he ask anybody else to do it?

11:05AM 10 A No.

11 Q How did you feel about that?

12 A I wasn't supposed to be working.

13 Q So how did that make you feel?

14 A I didn't -- I didn't think it was fair.

11:06AM 15 Q Did you tell him that?

16 A At the time, no.

17 Q Was there ever a time you told him you thought it
18 was unfair?

19 A Later when we talked.

11:06AM 20 Q How much later after that conversation did you
21 guys talk about it?

22 A When Marlon and I had our talk at his house.

23 Q Was it right after the Superbowl?

24 A I wouldn't say right after, but it was after.

11:06AM 25 Q Shortly after?

1 A More so on the short end.

2 Q A week?

3 A Probably less than a week. I can't actually
4 recall, but it -- it didn't -- it took place soon -- shortly
11:06AM 5 after.

6 Q Do you remember what words Marlon was using when
7 he yelled at you?

8 (Brief interruption.)

9 THE WITNESS: I -- you ready now?

11:07AM 10 BY MS. REA:

11 Q I'm ready --

12 A Oh.

13 Q -- I'm always ready.

14 A Can't -- I can't recall the actual words. I just
11:07AM 15 know that he was mad that I didn't jump up and do it right
16 away.

17 Q You felt like he expected you to jump up and do
18 things right away?

19 A He wrote my checks, so that's how -- yeah, that's
11:07AM 20 what he felt.

21 Q Did you go get Ms. Tinser?

22 A Eventually, yeah.

23 Q How long do you think -- what do you mean by
24 eventually?

11:07AM 25 A Once -- I wasn't dressed, so once I got dressed,

1 then --

2 Q Then you went and got her?

3 A Yes.

4 Q Did you say anything to her about the incident?

11:08AM 5 A I don't recall saying anything to her.

6 Q Did you talk to anybody else on the tour bus
7 about that incident?

8 A Don't really recall having a conversation with no
9 one.

11:08AM 10 Q How would you describe your relationship with
11 Marlon during that time?

12 A It was cool for a long time, and then -- you
13 know, I looked up -- I mean I liked Marlon, so I -- at one
14 point -- it was -- it was cool for awhile.

11:08AM 15 Q And then things changed?

16 A Yeah.

17 Q Do you remember what was happening at the time
18 things changed?

19 A I think the whole -- I mean -- yeah. It's like,
11:08AM 20 you know, I wanted a certain respect and he always felt
21 like he didn't have to give me a certain respect because
22 he was my boss.

23 Q What kind of things did you want him to do that
24 he wasn't doing?

11:09AM 25 A To appreciate certain thing -- you know, appreciate

1 my hard work and not, you know, write it off as not being
2 anything.

3 Q Do you think you got rode harder than other
4 people in the group?

11:09AM 5 A Yes.

6 Q Do you think anybody got off easy?

7 A I --

8 MR. THOMPSON: Objection. Relevance.

9 THE WITNESS: It's kind of hard to just -- you
11:10AM 10 more so worry about yourself. I mean, yeah.

11 BY MS. REA:

12 Q Who?

13 A I can't recall every -- you know, but -- things
14 were easier for other people.

11:10AM 15 Q Can you give me an example?

16 A No.

17 Q Did you ever talk to Marlon about things being
18 easier for other people?

19 A I expressed at times, but it was -- I -- I was
11:10AM 20 never being heard, so it -- it didn't matter.

21 Q How was your relationship with Shawn during this
22 time? And by this time, I mean the time we're talking
23 about right before the Superbowl.

24 A Shawn and I spent more time together, so I thought
11:10AM 25 that we had a better understanding.

1 Q Did you talk to Shawn about the incident in the
2 tour bus?

3 A After it happened, I -- I think I might have had
4 one conversation with him, but I can't really recall.

11:11AM 5 Q Was it before you talked to Marlon or after?

6 A I can't recall.

7 Q Do you remember the substance of that conversation?

8 A It might have been why you didn't tell him that I
9 asked could I not work. I can't exactly recall, but --

11:11AM 10 Q Did he tell you why he didn't tell his brother
11 you weren't working?

12 A I don't recall him ever having that conversation
13 with me.

14 Q Were you angry at Shawn about that incident?

11:11AM 15 A I wouldn't say angry, no.

16 Q How would you describe your feelings about that
17 incident?

18 A It was always -- my feeling was always the same
19 is that, you know, kind of unfair, like, so I can't remember
11:12AM 20 it, but I -- you know --

21 Q I understand. Did -- so Marlon, shortly after
22 you guys returned to L.A., correct, terminated your
23 employment; is that correct?

24 A I wasn't necessarily terminated. He called me to
11:12AM 25 the house and we both -- he sat at one end, I sat at the

1 and then not cool, and it'd always get back to the same
2 place.

3 Q Did you travel with Shawn and Marlon to Europe at
4 any point?

11:14AM 5 A Yes.

6 Q Both of them were on that trip?

7 A Yes.

8 Q Do you remember what year that trip was?

9 A Somewhere, like, in '90 -- I mean in, like, '01,
11:14AM 10 somewhere around -- in between the 2000, 2003 year.

11 Q Okay. Who paid for your plane ticket?

12 A I'm not sure.

13 Q Did you pay for it?

14 A No, I didn't.

11:15AM 15 Q Where did you stay?

16 A Can't remember; same hotel with them.

17 Q Did they get a suite?

18 A What do you mean? That I stayed in, or --

19 Q Did they have a suite that they booked?

11:15AM 20 A I'm sure they did. They always had suites.

21 Q And did you stay in that same suite or did you
22 have your own room?

23 A I believe on that trip I shared a room with Will
24 Adams.

11:15AM 25 Q Okay. Why was -- what was your understanding of

1 Will Adams being on that trip? Why was he there?

2 A I can't recall.

3 Q Were you working on that trip?

4 A Yes.

11:15AM 5 Q Was Will Adams working on that trip?

6 A I don't recall. I don't think Will was, but I'm
7 not sure.

8 Q Do you remember anybody else who was on that
9 trip?

11:15AM 10 A Rick Alvarez and, you know, staff, publicists.

11 Q Had you been to Europe before?

12 A No.

13 Q Where did you go in Europe?

14 A Paris.

11:16AM 15 Q Anywhere else?

16 A We went to London.

17 Q Did you fly commercial or a private jet?

18 A I believe from -- at some point I think we -- we
19 did fly private. I think we bo -- we flew both. I can't
11:16AM 20 recall.

21 Q Had you ever been on a private jet before?

22 MR. THOMPSON: Objection. Relevance.

23 THE WITNESS: Before what?

24 BY MS. REA:

11:16AM 25 Q Before you flew in Europe.

1 A No, I can't recall.

2 Q How many times do you think you've been on a
3 private jet?

4 MR. THOMPSON: Objection. Relevance.

11:16AM 5 THE WITNESS: Can't recall.

6 BY MS. REA:

7 Q More than once?

8 A Yes.

9 Q Each time that you flew on a private jet, was it
11:17AM 10 with one of the Wayans brothers?

11 A Yes.

12 Q Have you ever flown on a private jet without one
13 of the Wayans brothers?

14 MR. THOMPSON: Objection. Relevance.

11:17AM 15 THE WITNESS: No.

16 BY MS. REA:

17 Q When you were in Europe -- or in Paris --

18 A Uh-huh.

19 Q -- let's focus on that part of the trip, did you
11:17AM 20 get into any disagreements with Marlon on that trip?

21 A Yes.

22 Q How many?

23 A One.

24 Q What was the subject of that disagreement?

11:17AM 25 A In between the promos --

1 MR. THOMPSON: Objection. Relevance.

2 THE WITNESS: No.

3 BY MS. REA:

4 Q Did you get a VIP table at any of those clubs?

11:22AM 5 MR. THOMPSON: Objection. Relevance.

6 THE WITNESS: Not me, per se. They would get
7 them.

8 BY MS. REA:

9 Q And you got to sit with them?

11:22AM 10 A Yeah, but I was also working, so --

11 Q Did you meet -- would people come up to them
12 while you guys were at a club?

13 MR. THOMPSON: Objection. Relevance.

14 THE WITNESS: Yes.

11:22AM 15 BY MS. REA:

16 Q Did you meet girls through them?

17 MR. THOMPSON: Objection. Relevance.

18 THE WITNESS: Never had to meet girls through
19 them.

11:22AM 20 BY MS. REA:

21 Q Do you think you got more attention from girls
22 because of them?

23 MR. THOMPSON: Objection. Relevance.

24 THE WITNESS: I wouldn't say that. I knew a lot
11:23AM 25 of girls before them, so --

1 BY MS. REA:

2 Q So after the incident with the phone --

3 A Uh-huh.

4 Q -- what did you do? Did you leave?

11:23AM 5 A No. I sat right there and waited for whatever
6 else he needed.

7 Q What did Marlon say?

8 A Just laughed and kept talking about it, talking
9 about it, talking about it, talking about it.

11:23AM 10 Q Did you get to take a nap?

11 A Not till the end of the day.

12 Q Were there ever times where you went out to clubs
13 with Shawn or Marlon and you weren't working?

14 A No.

11:23AM 15 Q Did you ever socialize with them when you weren't
16 working?

17 A I was always on clock with them.

18 Q So whenever you spent time with them, you felt
19 like you were working?

11:24AM 20 A I was always working.

21 MS. REA: Can we take a quick break?

22 MR. THOMPSON: Sure.

23 THE VIDEO TECHNICIAN: Going off the record. The
24 time is 11:24 A.M.

11:38AM 25 (Recess taken.)

1 THE VIDEO TECHNICIAN: The time is 11:38 A.M.

2 We're back on the record.

3 BY MS. REA:

4 Q Earlier we were talking about freelance work that
11:38AM 5 you had done between approximately 1998, after the Wayans
6 Brothers Show was cancelled; is that correct?

7 A Yeah. What do you mean what's correct?

8 Q Is the fact that you did freelance work during
9 that time period --

11:39AM 10 A After Wayans Brothers?

11 Q Yes.

12 A Yes.

13 Q Can you list for me all of the sets that you
14 worked on when you were doing freelance?

11:39AM 15 A I can't recall.

16 Q Can you recall any of the sets?

17 A I can't recall.

18 Q You mentioned that you worked on a commercial.

19 A Yeah, but I -- I still can't recall where and
11:39AM 20 what it was for.

21 Q Do you remember the product that was being shown
22 in the commercial?

23 A That was so long ago. I can't -- I can't really
24 recall.

11:39AM 25 Q Do you remember was it an indoor shoot or an

1 outdoor shoot?

2 A During that time when I freelance, I did indoor
3 and outdoor shoots, so I can't recall exactly which one it
4 was.

11:39AM 5 Q And did you always freelance as a runner?

6 A Production assistant, runner.

7 Q Did you ever work in any other position on a set?

8 A Production assistant/runner.

9 Q Did you ever work with a camera?

11:40AM 10 A Wrangle cord, but you're still a P.A.

11 Q What does wrangle cord mean?

12 A You follow the camera on a dolly track and
13 wrangle the cord so that it doesn't get tangled up.

14 Q Did you ever hold a microphone?

11:40AM 15 A Boom op (sic), no.

16 Q A boom? Did you ever create sets?

17 A What do you mean create, set design or what do
18 you mean?

19 Q No, like physically build any of the sets.

11:40AM 20 A Physically build them, no.

21 Q Did you ever do set design?

22 A Props.

23 Q And what would you do with props?

24 A Set props up.

11:41AM 25 Q Was someone directing you where to put the props?

1 A Usually the person who's assigned the art
2 director, yeah, you work with them.

3 Q And when you were doing this work, were you paid
4 hourly?

11:41AM 5 A No. When you do P.A. work, it's on set,
6 freelance like that, it's usually a flat rate.

7 Q Are you paid check or in cash?

8 A In the earlier days, sometime it'd be cash, but
9 the lat -- the latter days, it'd be checks.

11:41AM 10 Q How long did the average stint as a P.A. last?

11 A What do you -- I'm trying -- what do you mean by
12 that?

13 Q Let me break it down. When you were hired as a
14 freelance P.A., would it be for a set term, a set time?

11:42AM 15 A Yeah. Like if you're a P.A. and on a video, it's
16 for however long that video's being shot.

17 Q What's the average time it takes for a video to
18 be shot?

19 A It varies.

11:42AM 20 MR. THOMPSON: Objection. Calls for speculation.

21 THE WITNESS: It varies.

22 BY MS. REA:

23 Q What's the longest time that you worked as a P.A.
24 in one production?

11:42AM 25 A I can't recall worked -- you said a P.A.?

1 Q (No audible response.)

2 A Well, I worked as a runner/P.A. with them for a
3 very long time, so --

4 Q Aside from the Wayans Brothers, what's the
11:42AM 5 longest production that you --

6 A Aside from them? I can't really recall. Might
7 have been a couple that were -- had the same amount of
8 time. I can't recall.

9 Q So there were a couple that you worked at the
11:43AM 10 same amount of time that you worked for the Wayans
11 Brothers?

12 A No. What I meant is a couple freelance gigs that
13 might have been on, you know, the time in which I worked
14 for those gigs might have been around the same amount of
11:43AM 15 time per -- per each gig. I can't recall, though.

16 Q Was it more than a month?

17 A Could have been, I believe so.

18 Q The productions that you were freelancing for,
19 were they series?

11:43AM 20 A What do you mean?

21 Q Like a television series that's regularly shot.

22 A In what period? What time are you talking about?

23 Q The same time where you're freelancing before you
24 start working for Shawn again.

11:43AM 25 A Again, when?

1 Q So when you said that you were terminated by
2 Keenen --

3 A I nev -- oh, okay.

4 Q -- and you didn't work for him again.

11:43AM 5 MR. THOMPSON: Objection. Misstates his testimony.
6 He didn't say he was terminated by Keenen.

7 BY MS. REA:

8 Q Do you understand my question?

9 A So after the Keenen show --

11:44AM 10 Q After the Keenen show --

11 A Uh-huh.

12 Q -- then you worked for the Wayans Brothers Show,
13 correct?

14 A Right, uh-huh.

11:44AM 15 Q And after that show was cancelled, then you
16 testified that you freelanced as a P.A., slash, runner and
17 did a bunch of stuff and that's where we talked about
18 Adecco --

19 A Uh-huh.

11:44AM 20 Q -- and temps and that kind of thing --

21 A Uh-huh.

22 Q -- correct? So I know you don't remember the
23 years when you were doing that time, you don't remember if
24 it's more than or less than a week --

11:44AM 25 A Uh-huh.

1 Q -- and less than three years, but I'm trying to
2 talk about that week to three years before you started
3 working for Shawn again.

4 A And when I started, it wasn't just working for
5 Shawn when I started working again.

6 Q It was for Shawn and Marlon; is that correct?

7 A Right, all three.

8 Q All three.

9 A Uh-huh.

10 Q And that's when you had the conversation with
11 Darnell about he called and didn't want to be their
12 personal assistant; is that correct?

13 A This was after Wayans Brothers, right.

14 Q Right.

15 A Uh-huh.

16 Q So the period between that call with Darnell --

17 A Uh-huh.

18 Q -- and Wayans Brothers Show being cancelled --

19 A Uh-huh.

20 Q -- I want to only talk about that time period --

21 A Okay.

22 Q -- I know you don't remember how long or what
23 years, so I can't refer to it by how long or what years --

24 A Okay.

25 Q -- but I want to have an agreement that when I

1 ask you the next couple questions, until I tell you I'm
2 talking about a different time period, we're talking about
3 that time period that we don't know how to describe.

4 A So in that time period, I can't recall how long I
11:45AM 5 worked on these -- you know, these various projects.

6 Q And just to be clear, during that time period,
7 you didn't work on any productions involving Shawn Wayans,
8 Marlon Wayans or Keenen Wayans?

9 A After Wayans Brothers, no.

11:45AM 10 Q Okay. During that same time period that we're
11 talking about.

12 A Yeah, after Wayans Brothers --

13 Q Yep.

14 A -- up until the call of Donnell, right.

11:46AM 15 Q Exactly. Did you make any other contacts in the
16 agency world?

17 A What do you mean?

18 Q The entertainment world, did you make any other
19 contacts?

11:46AM 20 A I'm still not clear. What do you exactly mean by
21 that?

22 Q Was there anyone else that you met during that
23 time period that worked in the entertainment industry?

24 A During the time period of what? In between --

11:46AM 25 Q Same type period that we're talking about, the

1 one that en -- that begins with the ending of the show and
2 that stops when you start working for the Wayans Brothers
3 again.

4 A Yeah, you meet a lot of people working in the
11:46AM 5 business.

6 Q Can you give me some examples of the people you
7 met during that time period?

8 A I can't recall, like --

9 Q Anybody you still keep in contact with today?

11:47AM 10 A Can't recall.

11 Q Any directors?

12 A I met people during that time that I still -- I'm
13 still trying to figure out the -- the exact date of the
14 time, but I still keep in contact with everyone I've met
11:47AM 15 pretty much.

16 Q What were the names of the projects? Give me one
17 name of the projects you worked on during this time period?

18 A Project, meaning -- what do you mean?

19 Q I'm just trying to figure out when you're a P.A.,
11:47AM 20 you go work on a project; is that fair?

21 A Uh-huh.

22 Q I'm trying to identify what those projects were.
23 You said there was a commercial, but you didn't remember
24 the name. I see yellow signs around L.A. Do you ever see
11:48AM 25 those, the little yellow signs where they're shooting

1 something?

2 A Right.

3 Q And they put a name of the project on there.

4 A Right.

11:48AM 5 Q So that everybody knows where to go for that
6 location.

7 A If you're on location, right.

8 Q Correct.

9 A Uh-huh.

11:48AM 10 Q It's like a secret code word.

11 A Right.

12 Q Do you remember any of the names that would have
13 appeared on those signs of the projects you worked on?

14 MR. THOMPSON: Objection.

11:48AM 15 THE WITNESS: I freelanced a lot of gigs, so I
16 can't remember, and most of those are like -- if they're
17 not a long -- long-running project, those are just like
18 short-period gigs.

19 BY MS. REA:

11:48AM 20 Q What do you mean by a long-running project?

21 A If it's not a movie or a series; you know, if
22 it's just a commercial or a video, you know, so --

23 Q Did you work with any music artists?

24 A Several.

11:49AM 25 Q What are their names?

1 A I can't recall all. I worked a lot of freelance
2 gigs.

3 Q Just give me one name.

4 A Lauryn Hill.

11:49AM 5 Q What video did you work on for Lauryn Hill?

6 A I can't remember exactly the name of the song.

7 Q How did you get that job?

8 MR. THOMPSON: Objection. Relevance.

9 THE WITNESS: Phone calls, knowing people, just --

11:49AM 10 BY MS. REA:

11 Q Who did you --

12 A -- (unintelligible).

13 Q -- I'm sorry. Who did you call?

14 A Can't recall.

11:50AM 15 Q So you don't remember the name of the song?

16 A No. It was so long ago.

17 Q Do you remember the name of the album?

18 A No.

19 Q What did you do for that video?

11:50AM 20 A I did extra work on that one.

21 Q And you -- do you have a copy of the video?

22 A I'm not sure.

23 Q Do you have a head shot?

24 A Yes.

11:50AM 25 Q And on your head shot, do you list all the jobs

1 that you've worked on?

2 A No.

3 Q What do you list on the back of your head shot?

4 A I don't.

11:50AM 5 Q So do you have a face card?

6 A What do you mean face card?

7 Q So some actors will have a card with pictures,
8 their head shot on one side, correct?

9 A Right, but I'm not an actor.

11:50AM 10 Q So what do extras use as their resume?

11 MR. THOMPSON: Objection. Calls for speculation.

12 THE WITNESS: The jobs they worked on, I'm sure.

13 BY MS. REA:

14 Q Do you have a resume?

11:51AM 15 A I'm not an extra.

16 Q Do you have a resume?

17 A Yes.

18 Q Do you list that appearance on your resume?

19 A At this current moment, no.

11:51AM 20 Q Did you ever?

21 A I can't recall.

22 Q When did you first create your resume?

23 A I've created several. I don't --

24 Q Did you create a resume when you worked for Pizza

11:51AM 25 Hut?

1 A I don't recall, I can't recall.

2 Q What about when you worked for the towing company?

3 A Can't recall.

4 Q Did you create a resume when you started working

11:51AM 5 for Keenen on the Keenen Ivory Wayans Show?

6 A Can't recall.

7 Q Were you ever asked to submit a resume for your
8 freelance work?

9 A I can't recall.

11:52AM 10 Q Do you appear on camera in this video as an extra
11 for Lauryn Hill?

12 A Yes.

13 Q Is it on YouTube?

14 A Not sure.

11:52AM 15 Q How long are you on camera?

16 A Not sure.

17 Q What are you doing in the background?

18 A Atmosphere.

19 Q Were you dancing?

11:52AM 20 A Don't recall if I was dancing.

21 Q Was it in a club?

22 A No, it wasn't; it wasn't in a club.

23 Q How many other people were in the frame with you?

24 A Not sure.

11:52AM 25 Q More than one?

1 A Possibly.

2 Q Was Lauryn in the video with you?

3 A It was her video.

4 Q But did she appear in the frame with you?

11:52AM 5 A No.

6 Q What other projects did you work on during this
7 same time period?

8 A I can't -- it was several.

9 Q Give me another example.

11:53AM 10 A I can't recall.

11 Q Do you have any resumes that you can use to
12 refresh your recollection as to what jobs you did do
13 during this time?

14 A I don't have any here with me, no.

11:53AM 15 Q At home.

16 A Ask that question again.

17 Q At home, do you have any resumes that would
18 refresh your recollection as to what projects you worked
19 on during this time period that we've been talking about?

11:53AM 20 A I'm not sure.

21 Q How do you keep your contact information for
22 people?

23 MR. THOMPSON: Objection. Foun -- no foundation.

24 THE WITNESS: Contacts; what do you mean, what
11:53AM 25 kind of contacts?

1 your job as his personal assistant?

2 MR. THOMPSON: Objection. Misstates his testimony.

3 THE WITNESS: Marlon never fired me.

4 BY MS. REA:

11:56AM 5 Q So none.

6 A None.

7 Q None. How many times did you say guys mutually
8 agree to part ways?

9 A Once.

11:56AM 10 Q How many times did you quit working for Marlon?

11 A I quit working for all of them.

12 Q How many times?

13 A Once.

14 Q When was that?

11:56AM 15 A The last time I worked for them.

16 Q Do you know a year?

17 A It was '06.

18 Q And your understanding is that you were working
19 for all of them at that time you quit?

11:57AM 20 A When I quit, I was still collecting a Wayans
21 Brothers check which -- yes, so all three of them.

22 Q Why did you quit?

23 A Because I was fed up with Marlon's total berating
24 me and, you know, talking down on (sic) me and screaming
11:57AM 25 on me and -- so I quit.

1 Q Why did you quit working for Shawn?

2 A I quit working for Shawn because after the gig

3 in -- the stand-up gig in Vegas, I felt like after -- I

4 felt like after all the hard work I had been doing with

11:58AM 5 him also on the road that he, too, was being unfair, and I

6 felt like it was just completely time for me to go. I

7 felt like I had always worked very, very hard and wasn't

8 un -- it was unfair once I found out what people who did

9 my job, you know, what kind of work they did and what kind

11:58AM 10 of salary and things they made, I just felt like I was --

11 I wasn't -- it wasn't fair.

12 Q Did you ask for a raise?

13 A I asked for a raise a couple times.

14 Q Who did you ask for a raise the first time?

11:58AM 15 A The only person I ever talked to about that was

16 Shawn.

17 Q Do you remember the first conversation you had

18 about raises with him?

19 A I don't remember the first conversation.

11:59AM 20 Q When you say that other people were making a

21 different amount. Is that a fair characterization of your

22 testimony, that other people in your position?

23 A No -- well, other people in my position where --

24 at the company or what do you mean?

11:59AM 25 Q Whatever you were using to base your feeling that

1 that started the process --

2 A That was in 2000.

3 Q Okay.

4 A Uh-huh.

12:31PM 5 Q So how long did you work for them in 2000 to the
6 next time that you remember stopping working for them?

7 A From 2000 to 2003.

8 Q And that's when the Superbowl incident happened?

9 A Yes.

12:31PM 10 Q And then you mutually agreed to part ways with
11 Marlon --

12 A Yes.

13 Q -- is that correct? And what did you do in 2003
14 after you mutually parted ways with Marlon?

12:31PM 15 A I worked -- that's when I worked for Washington
16 Mutual --

17 Q Okay. So before --

18 A -- filing loans.

19 Q So we had talked about that before, but this is
12:32PM 20 after the 2003 period, so we're clear. After 2003, you
21 worked for Washington Mutual.

22 A From 2003 I only -- I took one year -- it was a
23 one-year sabbatical away from them, and in that point is
24 when I worked for Washington Mutual.

12:32PM 25 Q And you got that through Adecco?

1 our name in a computer also.

2 Q And then was your check mailed or direct
3 deposited?

4 A It was -- I can't remember at that time. It was
12:36PM 5 either mailed or direct deposit. I can't remember.

6 Q After you stopped working at Washington Mutual,
7 did you continue to receive paychecks?

8 A No. I only received them while I was working.

9 Q Did you borrow money from anybody in connection
12:36PM 10 with your employment at Washington Mutual?

11 A Borrow money? No.

12 Q Did you ever borrow \$12,000 from Shawn Wayans?

13 A It was a loan, yes.

14 Q Do you remember when you did that?

12:36PM 15 A Can't remember.

16 Q Was it while you were working at Washington
17 Mutual?

18 A Can't remember.

19 Q Was it after?

12:36PM 20 A Can't remember.

21 Q What did you tell Shawn Wayans that money was for?

22 A Well, because af -- the first time I worked with
23 him, after the disagreement with Marlon, I had -- went
24 through a rough period and I told him I was behind on my
12:37PM 25 bills, and I didn't even ask for the loan, he offered the

1 loan.

2 Q What do you mean a rough period?

3 A Just a rough period; I went through a rough
4 period after not having a job for awhile.

12:37PM 5 Q By rough period, do you mean financially, it was
6 rough?

7 A Yes.

8 Q Emotionally, it was rough?

9 A Both.

12:37PM 10 Q Did you have any health problems during that
11 time?

12 A Might have been stressed a bit.

13 Q Did you apply to a bank for that loan?

14 A No, Shawn loaned it to me.

12:38PM 15 Q Did you have credit card debt at that time?

16 A Yes.

17 Q Did you use the loan to pay off credit card debt?

18 A I asked him for a loan to take care of all the
19 things I needed to take care of.

12:38PM 20 Q But when you got that -- at some point he gave
21 you -- or loaned you the \$12,000, correct?

22 A Yes.

23 Q When you received that money, what did you do
24 with it?

12:38PM 25 A I took care of the things I needed to take care

1 of.

2 Q Did you pay off a credit card?

3 A I took care of all the things I needed to take
4 care of.

12:38PM 5 Q Was a credit card one of those things?

6 A Might have been, yes.

7 Q Maybe not?

8 A I'm sure it was -- that was part of my bills.

9 Q How much was your credit card balance?

12:38PM 10 A I can't recall.

11 Q What kind of credit card did you have?

12 A I can't recall.

13 Q Did you have a car?

14 A Had a car.

12:39PM 15 Q Was it owned?

16 A No, I was behind on that also.

17 Q Was it a lease?

18 A I was not leasing it, no.

19 Q So you had a loan to purchase it?

12:39PM 20 A Yes.

21 Q What kind of car did you have?

22 A At the time, a Honda Civic.

23 Q What year was it?

24 A Can't remember the year.

12:39PM 25 Q Who did you get the loan from to buy the car?

1 A I financed it through someone.

2 Q Did you buy it through a car dealership?

3 A Yes.

4 Q Did anyone ever try to repossess your car?

12:39PM 5 A I don't recall. I mean I was behind, but no one
6 ever tried to come repo it. I mean it was -- they -- I
7 was getting -- I was getting calls, so that's the next
8 step, I guess.

9 Q Did you -- and you testified you lived in an
12:40PM 10 apartment. Is that during this time?

11 A I believe so, yes.

12 Q Were you current on your rent?

13 A I was a little behind, I believe. I'm not sure.
14 I can't recall.

12:40PM 15 Q Did you have a roommate?

16 A At that time -- at what point are we talking
17 about?

18 Q Same time when you asked for the loan, you get
19 the money and you said you're behind.

12:40PM 20 A I had a friend who was staying with me, but he
21 didn't have money to pay either. He would stay sometimes.

22 Q What's that friend's name?

23 A Physent.

24 Q And what was your address?

12:40PM 25 A 310 --

1 Q Uh-huh.

2 A -- East Plymouth.

3 Q And how long did you live in that apartment?

4 A I had been there for some years.

12:41PM 5 Q Were you ever evicted?

6 A Yes.

7 Q When were you evicted?

8 A About a year ago.

9 Q During the time we're talking about, were you
12:41PM 10 ever evicted from that apartment?

11 A No.

12 Q Did you ever get an eviction notice?

13 A I had got a few notices, but I was able to end up
14 paying.

12:41PM 15 Q How far behind were you on your rent?

16 A I can't really recall, but enough to where I got
17 a letter to let me know I had to --

18 Q Did you have to hire an attorney?

19 A No.

12:41PM 20 Q Did you use any part of the \$12,000 to retain an
21 attorney?

22 A No.

23 Q Have you ever been arrested?

24 A No.

12:41PM 25 Q Have you ever been stopped by a police officer?

1 A "How to know Your" -- "Your" -- "Your Momma's
2 Ghetto."

3 Q And then the third?

4 A "Golddigger."

12:44PM 5 Q Did you write a fourth book?

6 A No. I had toyed around with a few things, but
7 nothing that I ever -- didn't complete a full list.

8 Q So describe your first book, "101 Ways to Know
9 Your Children's Party's Ghetto." What's that about?

12:45PM 10 A "How to Know Your Kid's Party is Ghetto" opposed
11 to something that's considered classy.

12 Q And you started working on that in 2005?

13 A Towards the -- prob -- yeah, somewhere in 2005.

14 Q Were you working for the Wayans Brothers in 2005?

12:45PM 15 A Yes.

16 Q Did they tell you to work on that book?

17 A No.

18 Q Where did you work on that book?

19 A I worked on that book at home, at the office on
12:45PM 20 my computer, my girlfriend's house, wherever I was at.

21 Q When you envisioned this book, did you envision
22 it being a long book or a short text?

23 A What do you mean by long book, short text?

24 Q Well, when I read a novel, I would say that's a
12:46PM 25 long text. Did you enpic (sic) -- envision it being a

1 novel?

2 A I envisioned it being a coffee table book, a
3 humor book. They had done a book before, so I was doing
4 it in the same vein as what they had done before, "150
12:46PM 5 Ways to Know You're Ghetto" or whatever.

6 Q Who is "they"?

7 A Shawn.

8 Q How did you know about that book, "150 Ways to
9 Know You're Ghetto"?

12:46PM 10 A I knew it existed through them, and, you know.

11 Q Did you ever talk to Shawn about that book?

12 A About which one?

13 Q "150 Ways to Know You're Ghetto."

14 A Talked to him how? What do you mean?

12:46PM 15 Q Just have any conversations in which that book
16 came up.

17 A No, I don't recall having a conversation to (sic)
18 him about that one.

19 Q Did you ever ask how he wrote that book?

12:47PM 20 A No, I didn't have to ask, I could read it.

21 Q So did you picture your book illustrated?

22 A What do you mean?

23 Q Did you -- did you envision -- you said a coffee
24 table book. Do you -- do you envision pictures with it?

12:47PM 25 A I enpictured (sic) my book being in the same vein

1 of what that was.

2 Q Which is what?

3 A The same vein in which "150 Ways to Know You're
4 Ghetto."

12:47PM 5 Q So you were going to copy that style?

6 A Not necessarily copy, but jokes, followed with --
7 married with illustrations.

8 Q Were they going to be photographs or illustra --
9 hand drawn?

12:47PM 10 A Hand-drawn illustrations.

11 Q Do you draw?

12 A No.

13 Q Who did you think would draw your illustrations?

14 A The artists that were around.

12:47PM 15 Q What names? Any in particular?

16 A First, let me un -- I want to understand what you
17 mean by what I envision.

18 Q Uh-huh. Well, you said you sat down around 2005
19 to write this book, correct?

12:48PM 20 A Right, but that's not -- I kind of let you get me
21 on the envision. It's not -- I'll tell you the reason why
22 I sat down and wrote the book.

23 Q But that's not my question. My -- my question is
24 about -- you said you wanted it to be in the same vein as

12:48PM 25 "150 Ways to Know You're Ghetto" --

1 A Right.

2 Q -- and that you intended it to be jokes and
3 illustrations; is that correct?

4 A Right.

12:48PM 5 Q And you didn't intend to do the illustrations,
6 correct?

7 A No, I didn't intend to do the illustrations.

8 Q You thought somebody else would do those
9 illustrations?

12:49PM 10 A Well, yeah, because they already were trying to
11 dust that property off, and the reason why I wrote it was
12 so that I could have a book included in that property.

13 Q Okay. What about "101" --

14 A So because I'm knowing that that's what they're
12:49PM 15 doing, the artists were already on staff, so my reasons
16 for writing the book is if it happened to be good enough,
17 I knew that it would go through the process of the artist
18 illustrating it and them finding, you know, someone to do
19 it.

12:49PM 20 Q So the artists who were working with the Wayans
21 Brothers and working on the other "101 Ways" would work
22 with you to create illustrations. Is that what -- is this
23 what you envisioned when you were writing that book?

24 A I envisioned to write a book that would take me
12:49PM 25 from being an assistant runner --

1 Q Uh-huh.

2 A -- to progressing myself in a situation after
3 being told I wasn't doing anything, so I sat and I wrote
4 this book at night, 3:00 in the morning, at home, weekends,
12:50PM 5 and I brought it to them after I was done.

6 Q But when you were writing it, who did you think
7 would illustrate "101 Ways" --

8 A The writers that we had on staff, that was on
9 staff, David Torres --

12:50PM 10 Q Uh-huh.

11 A -- Darren Huang (phonetic).

12 Q Uh-huh.

13 A -- and Larin DeJeannette (phonetic) which was --
14 who was hired to do most of the freelance illustrations on
12:50PM 15 the book.

16 Q And what about "101 Ways to Know Your Momma's
17 Ghetto"?

18 A I -- I wanted all three of them. I wrote -- my
19 whole thing was to write as much as I could to try and see
12:50PM 20 what could get on.

21 Q And the same thing with "Golddigger"?

22 A Yes.

23 Q So when you wrote the text of "Golddigger," your
24 text --

12:51PM 25 A Yes.

1 Q -- you intended there to be illustrations. Do
2 you know how many you would want?

3 A The reason why I intended, that's the style of
4 the book. The style of the book is to have jokes married
12:51PM 5 with illustrations, so I could have written just a regular
6 book, but I wrote a book in the vein of what it is the
7 property was.

8 Q Why didn't you write a regular book?

9 A Because this was a property that they already had
12:51PM 10 and working inside of a company which is not unheard of, I
11 wanted to get a project going. I knew that if I wrote a
12 script, they wouldn't read it, so I wanted to be effective
13 and write something that had potential to get on, and at
14 the time, this was something that they were trying to do.
12:51PM 15 They were trying to do this series again..

16 Q So you envisioned when you started working on
17 "101" -- how do you want to refer to "Golddigger" because
18 I don't want to mix terms.

19 A My original name was "Groupie."

12:52PM 20 Q Okay. So when you wrote your transcript -- do
21 you want to call it "Groupie." Is that fair?

22 A I had "Groupie, slash, Golddigger." I was trying
23 to figure out the two.

24 Q Okay. So when you started this transcript --

12:52PM 25 A Uh-huh.

1 Q -- this text, you envisioned it with
2 illustrations. Do you know how many you would have?

3 A Didn't know at the time because I was being -- I
4 wasn't told till afterwards how many illustrations were
5 required.

12:52PM

6 Q But you envisioned them hand drawn; is that
7 correct?

8 A However, yeah; hand drawn, illustrated.

9 Q And that they -- these illustrations would be
10 paired with your text?

12:52PM

11 A Well, you can't have the illustration without the
12 joke, so the joke has to come first.

13 Q And you thought that David, Darren, or
14 Lauren (sic) --

12:53PM

15 A Who?

16 Q David was one --

17 A Torres.

18 Q Torres.

19 A Uh-huh.

12:53PM

20 Q -- Darren Huang --

21 A Uh-huh.

22 Q -- Lauren -- I'm sorry, I didn't catch the last
23 name of Lauren, that you said was the freelance --

24 A Oh, Loran (phonetic).

12:53PM

25 Q Loran?

1 so --

2 Q What else did you write that you didn't let,
3 anyone read until it was completed?

4 A I wrote the other two books and I didn't show
12:54PM 5 them until I was finished because, you know --

6 Q Why?

7 A Can't show something that's incomplete.

8 Q How many jokes were in your text "101 Ways to
9 Know Your Children's Party is Ghetto"?

12:55PM 10 A I can't recall the actual number that I wrote. I
11 just know that the goal was to reach 101, so I would have
12 written over that to try and, you know, give the best
13 options for the funniest jokes, but I can't remember exactly
14 how many I wrote for that one.

12:55PM 15 Q Who told you the goal --

16 A But I wrote over the 101 limit.

17 Q Who told you the goal was 101?

18 A That was the name of the property.

19 Q How'd you know that?

12:55PM 20 A Because they had been working on it. Ahyoung.
21 You know, I knew -- I'm in the office, so I knew what was --
22 what was being worked on and what wasn't.

23 Q What else was being worked on at that time?

24 A "Monsters." Well, actually -- I can't remember,
12:55PM 25 but it was a few things. They had a bunch of things going

1 on at that time, Little Man. We were starting to work on
2 Little Man and -- and so it was various things and Little
3 Man, the "Monsters." It was a few things going on.

4 Q When did you finish "101 Ways to Know Your
12:56PM 5 Children's Party's Ghetto"?

6 A I can't remember an actual date, but in around
7 that year of '05.

8 Q Did you start working on it in the beginning of
9 '05?

12:56PM 10 A I can't recall exactly when I started working on
11 it.

12 Q Did you ever work on it in the office?

13 A I would work after hours on my computer, yes.

14 Q Did you ever work on it at Shawn's house?

12:56PM 15 A No, I don't recall working on it because I was
16 working. I worked on my projects when I wasn't doing work
17 for them.

18 Q Did you ever work on "101 Ways to Know Your
19 Momma's Ghetto" at the office?

12:57PM 20 A Yes, I worked on my computer after hours, after I
21 was done working for them.

22 Q Were they ever there when you worked on it?

23 A I don't recall if they were.

24 Q When did you finish that book?

12:57PM 25 A In around the same time. It didn't take long to

1 A It wasn't -- assistant at Wayans Brothers. I
2 mostly -- now you can ask me who I mostly worked with at
3 times. I worked more with Shawn and Marlon, more with
4 Shawn.

02:07PM 5 Q But your title wasn't an assistant to anybody?

6 A There was no -- my -- my title -- there was no,
7 you know, formal title, but I knew what -- I knew that my
8 job was assistant/runner, same as it had always been with
9 them.

02:07PM 10 Q Were you working the night that you had this
11 conversation with Shawn?

12 A I was always working.

13 Q And --

14 A Any time I was with them, whether it was a club
02:07PM 15 or office, I was always on clock working.

16 Q Was that your choice?

17 A That was my job. It was either do that or not be
18 working.

19 Q Did you mention the title, "You Know You're a
02:08PM 20 Golddigger When" during that conversation?

21 A Never mentioned -- I mentioned -- I mentioned the
22 seed of what my idea was. It wasn't completely -- I just
23 said I have an idea to write how to -- you know, how to
24 know you -- the thing about it is those series -- those
02:08PM 25 wasn't (sic) the only books that existed. There were

1 other books out there that existed also. Jeff Foxworthy
2 had written a book, "How to Know You're a Redneck" which
3 is how I titled mine in the first place.

4 Q I thought the title of your book was, "You Know
02:08PM 5 You're a Golddigger When," not "How" --

6 A "How to Know When" -- "How to Know When."

7 Q So the title of your book was "How to Know When
8 You're a Golddigger"?

9 A Right.

02:08PM 10 Q And you modeled that off Jeff Foxworthy?

11 A It wasn't so much that I modeled it after him.
12 Like I said before, there were several other books out
13 there, and if I'm not mistaken, I think that Jeff -- Jeff
14 Foxworthy's came before Shawn's, I'm not sure, but there
02:09PM 15 are tons of other humor books that, you know, kind of
16 phrase and start the same way, so that was in the vein of
17 what they were.

18 Q Did you ever pitch your book to Jeff Foxworthy?

19 A No.

02:09PM 20 Q Did you ever send him a copy of your book?

21 A No.

22 Q Did you write any other books in your "How to
23 Know Your Blank When" series?

24 A Originally, the titles were changed not because
02:09PM 25 of me, so my original copies were "How to Know." That's

1 how I started mine.

2 Q So the first title of your book for "How to Know
3 You're Having" -- "Your Kid's --

4 A Those were changed --

02:10PM 5 Q -- party?

6 A -- those were changed later when they did the
7 mockup covers which had my name on it.

8 Q I don't want to know anything about the mockup
9 covers.

02:10PM 10 A I know, but I'm telling you that I didn't change
11 those.

12 Q Okay. I'm still talking about the same night,
13 you're sitting with Shawn --

14 MR. THOMPSON: Objection. Misstates his

02:10PM 15 testimony. He didn't say he was sitting with anyone.

16 BY MS. REA:

17 Q And you're having a conversation.

18 A I'm telling you about "Golddigger." The other
19 two books, that's not what -- I'm telling you how I titled
02:10PM 20 "Golddigger."

21 Q Okay. But I don't want to know how you titled
22 "Golddigger." I want to know during that conversation --

23 A Uh-huh.

24 Q -- you said you had an idea. What was that idea
02:10PM 25 that you told Shawn about?

1 Q Were you dating Kimberly Logan then?

2 A Yes.

3 Q Where were you living?

4 A Same place I lived for 15 years, over 15 years.

02:17PM 5 Q Can you give us that address, again, please?

6 A The address I gave you earlier, 310 Plymouth.

7 Q What did you talk about in regards to your book
8 with Xavier Cook?

9 A I pitched him ideas, like told him jokes and --
02:18PM 10 to get his feedback on them, run jokes by him.

11 Q So this was before it was finished?

12 A Might have been during, as I was doing it and
13 after, so in between the process, because, you know, that
14 was during that time.

02:18PM 15 Q What about with Ron Sierra, what did you talk
16 about?

17 A Well, Ron Sierra worked for the company, so he
18 was always around and he's my friend, and I would also do
19 the same thing with him.

02:18PM 20 Q Same thing, what do you mean?

21 A Run jokes by him.

22 Q And what about Michael Snowden?

23 A Same thing, I'd run jokes by him.

24 Q And what about Scott Williams?

02:18PM 25 A Scott Williams knew because I talked about it

1 just another thing in the pipe -- you know, pipeline that
2 they were, you know, possibly trying to do, but in terms
3 of something actually happening with them, I knew nothing
4 about any of that.

02:25PM 5 Q How do you define "possibly happening"? You said
6 something possibly happening. What does that mean?

7 A Because everything -- for instance, I mean, you
8 know, they write a script. The reason for writing it is
9 to get it produced and made, so, you know, once I -- so
02:25PM 10 knowing that they had wanted to do that series, the series
11 they had, I knew that it had a potential to actually be
12 something; when, if, how and -- didn't know, though.
13 That's what I mean by that.

14 Q Did you ever go home at night and work on a movie
02:26PM 15 script for the Wayans?

16 A Never went home and worked on a movie script for --
17 only once that I worked -- I worked on a movie script for
18 them.

19 Q What script did you work on for them?

02:26PM 20 A I was -- I did punch-up on Little Man.

21 Q Have you ever done stand-up?

22 A Never done stand-up.

23 Q Your script, "Indigo Boy," is that a comedy?

24 A Had humor in it. It's not a full comedy, no.

02:26PM 25 Q How would you describe it?

1 A Drama.

2 Q A drama. So earlier you testified that you knew
3 around the office they were working on a "101 Ways"
4 series; is that correct?

02:27PM 5 A I knew that the property -- they were trying to
6 dust that property off, yes. I knew that they were trying
7 to redo those series.

8 Q How did you know that?

9 A I worked for them and I would be around, and, you
02:27PM 10 know, Ahyoung also informed me. I would sit and talk with
11 her and find out what was going on.

12 Q Are you friends with Ahyoung Kim?

13 A Yes.

14 Q What would Ahyoung Kim tell you about them
02:27PM 15 dusting off their property?

16 A I didn't so much have to just find out like what --
17 what are -- what's everything they're working on. I mean
18 I didn't have to necessarily ask her. It was right there.
19 I was there in the office every day and I could see with
02:28PM 20 my own eyes, without actually having to ask, what was
21 going on.

22 Q But you just said you asked Ahyoung Kim, right?

23 A No, I don't -- I don't think I -- well, it's not
24 necessarily that I asked her about it. I might have had
02:28PM 25 conversations with her about the property, so let me

1 correct?

2 A Because you said had I gone to New York with
3 them, and I said I've been to New York with them several
4 times, and if they were pitching a book on either one of
02:31PM 5 those trips, I was unaware of that. I knew nothing about
6 it. I wasn't in a meeting while they were pitching. I
7 knew nothing about it.

8 Q So you could have --

9 A There was no itinerary that said they were going
02:32PM 10 to pitch meetings -- pitch books. I knew nothing about
11 it.

12 Q So you could have been on that trip.

13 MR. THOMPSON: Objection. Misstates his testimony.
14 Assumes facts not in evidence.

02:32PM 15 BY MS. REA:

16 Q You can answer.

17 A I mean, we traveled to Paris, I could have -- you
18 know, deals, I don't know. I could have been anywhere. I
19 don't know when that was. I have no knowledge of when
02:32PM 20 they went and pitched these books.

21 Q And you didn't hear anybody in the office talking
22 about them pitching the books?

23 A The only way that I knew anything about them was
24 when I saw the poster board, and even then, I don't know
02:32PM 25 when they pitched them.

1 Q What poster board did you see?

2 A The poster board with all the covers on there.

3 Q Of what? Covers of what?

4 A Covers of the "101 Way."

02:32PM 5 Q Where were you when you saw that?

6 A At the office.

7 Q In L.A.?

8 A Yes.

9 Q Do you know which location you were at?

02:32PM 10 A Wayans Brothers Productions.

11 Q The one in The Grove?

12 A Yes.

13 Q Where was the board when you saw it?

14 A Ahyoung had it in her office.

02:33PM 15 Q Why were you in Ahyoung's office?

16 A She was the first office you see when you walk

17 in, and because she was an employee there and also a

18 friend, I'd stop in and mess with her and say hi, and all

19 the things she was working on was aligned (sic) around in

02:33PM 20 her office.

21 Q Did you ask her about the board?

22 A I asked, you know -- I actually asked because I
23 was proud to see my stuff on there. I asked for a copy of
24 it.

02:33PM 25 Q And did you get a copy of it?

1 A Yes.

2 Q How did she make you a copy of the board?

3 A I believe she -- I don't know how she physically
4 did it, but I got a copy afterwards.

02:33PM 5 Q Well, was the board --

6 A And also because -- oh, go ahead.

7 Q Finish your answer.

8 A I was just saying I -- I'm sure she probably made
9 up a couple, I don't know, but I was able to get a copy.

02:34PM 10 Q Was the board big?

11 A What do you mean by big?

12 Q Well, is it as big as a piece of paper?

13 A It was bigger than a piece of paper.

14 Q Was it the size of a poster board?

02:34PM 15 A Don't know measurements, but it was bigger than a
16 piece of paper.

17 Q Did it sit on an easel?

18 A It could have.

19 Q Did you ever go look at the board up close?

02:34PM 20 A Sure.

21 Q What did you see?

22 A Covers with my name on there.

23 Q At the time you saw that board, what had you
24 written?

02:34PM 25 A I had written "The Ghetto," "How to Know Your

1 Kid's Party is Ghetto," "How to Know Your Ghetto Momma,"
2 and I had written "Gold" -- "How to Know When You're a
3 Golddigger" -- "Groupie, Golddigger," but for some reason,
4 whatever reason, they didn't put that cover on there, but
02:35PM 5 the cover was made.

6 Q So you had created the -- how many jokes were in
7 the kids' party book?

8 A It was over 101. I wrote several, but once they
9 changed the name and took it, they went to fit inside of
02:35PM 10 their prop -- they scaled it down to fit the 101.

11 Q So when you saw the poster board, you had written
12 the complete version of "Kids' Ghetto Party."

13 A I wrote the complete version of "Kids' Ghetto
14 Party."

02:35PM 15 Q And how many jokes did that have?

16 A Like I said, I wrote several. I can't remember
17 exactly, but I know that if it was going to -- and for it
18 to be a part of that, for them using it, for them using
19 it, whatever, it had to fit the 101.

02:36PM 20 Q So when you wrote it, did you try to make it fit
21 in the series?

22 A No. I mean I wrote it as a means for -- I wrote
23 all the jokes, and if it was going to go in that series,
24 yes, it had to be scaled down to 101.

02:36PM 25 Q Did you write -- strike that.

1 A Didn't contact anyone at that point because I
2 felt like I could pitch it here in-house and have an
3 opportunity to finally get my talent rec -- you know,
4 recognized or a moment to show that I had some -- some
02:44PM 5 sort of talent since I had always been looked at as not
6 having.

7 Q Well, you knew other people were working on other
8 books in the series?

9 A I knew people were working on scripts, animations;
02:44PM 10 everything was going around.

11 Q But did you know other people were working on
12 books in the series?

13 A Other people, no. No one else besides myself.
14 Like I said earlier, I knew that Marlon had written a
02:44PM 15 couple himself at some point, and I don't know if he had
16 written them before I started working back with them. I
17 don't know when. Nothing was moving on that. Nothing was
18 moving on the series, and if they were, I knew nothing
19 about them. I simply got -- I sat and said how can I
02:45PM 20 progress myself out of this situation. A script idea I
21 have, they're not going to like it. What can I do right
22 now to move myself out of this position.

23 Q Well, you knew someone was working on it because
24 you saw a pitch board, right?

02:45PM 25 A Well, you're talking about a time period -- when

1 A Deadlines, meaning what?

2 Q Did anyone tell you you have to get something
3 done by a certain time?

02:46PM 4 A Toward the end, you know, when I -- they would
5 ask me, you know, when they started trying to work on the
6 illustrations --

7 Q Who?

8 A Once they started the process of working on
9 illustrations for the book, it wasn't -- I never had a
02:46PM 10 deadline, no, I never had a deadline. I don't -- I don't
11 even know why --

12 Q Who did you work on illustrations with?

13 A David Torres, and I was -- because I wrote the
14 jokes, when it came time for him to illustrate the
02:47PM 15 picture, I was instructed to, you know, lead him, guide
16 him, to what it is, the real -- what the joke is because I
17 wrote it.

18 Q Who instructed you?

19 A At this point, after I had pitched and given them
02:47PM 20 my jokes, and, you know, they started showing interest in
21 them, it was, you know, Shawn and Marlon, either one of
22 the two, would tell me to sit in to --

23 Q Sit in on what?

24 A Not sit in, to go and tell him what the joke is
02:47PM 25 if he needed, you know, help trying to illustrate it.

1 Q You said sit in.

2 A Sit with him.

3 Q Whose is "him"?

4 A David Torres and, you know, help him understand

02:47PM 5 what the joke is that I wrote.

6 Q Who told you to do that?

7 A It was either Shawn or Marlon. No one else was

8 working on or -- you know, I dealt with them majority of

9 time on things.

02:48PM 10 Q With who?

11 A Including -- doing runs and -- Shawn and Marlon.

12 Q Okay. So did they know everything you were

13 working on?

14 MR. THOMPSON: Objection. Calls for speculation.

02:48PM 15 THE WITNESS: Who is "they"?

16 BY MS. REA:

17 Q Shawn and Marlon.

18 A Yeah, they were my bosses. They knew -- you

19 know, in terms of what do you mean working on?

02:48PM 20 Q Did they know you were working on your book for

21 "How to Know You're a Groupie"?

22 A They knew that only after it was done when they

23 started, you know -- when they wanted to try and, you

24 know, when they got interested -- when they got interested

02:48PM 25 in the book, it was long after I had already written the

1 book.

2 Q When did you write the book?

3 MR. THOMPSON: Objection. Asked and answered.

4 THE WITNESS: Somewhere in the year of, like I

02:48PM 5 said, '05 --

6 BY MS. REA:

7 Q And you were working --

8 A -- between --

9 Q Go ahead.

02:49PM 10 A Somewhere in there.

11 Q But before -- you -- you said they were
12 interested in the books; is that correct?

13 MR. THOMPSON: Objection --

14 THE WITNESS: I --

02:49PM 15 MR. THOMPSON: -- vague.

16 THE WITNESS: I don't know what you mean by that.
17 What are you saying?

18 BY MS. REA:

19 Q So you said that at some point Marlon became
02:49PM 20 interested in your book.

21 A They -- Shawn and Marlon became interested in the
22 book, in my book, after Keenen came in and expressed how
23 much he liked it.

24 Q When did you show Keenen your book?

02:49PM 25 A I -- I pitched Keenen my book by leaving it at

1 his apartment. I pitched it by leaving my jokes with him
2 to read. He came in and raved about how funny it was.
3 Shawn and Marlon came out, because he came in and was
4 like, you know, "Where the fuck is Jared at" -- excuse my
02:49PM 5 language -- and everyone thought I was in trouble, and he
6 expressed how funny the jokes were. Shawn and Marlon came
7 out and that was it.

8 Q Which version did you leave for Keenen at his
9 apartment?

02:50PM 10 A "How to Know You Were" -- "How to Know You're a
11 Gropie (sic)" -- "Groupie, Golddigger." I had both. I
12 wasn't -- you know, I cou -- didn't completely edit mine
13 and make the full until after, so I had "How to Know" --
14 "How to Know When You're a Groupie, Golddigger."

02:50PM 15 MS. REA: I'm going to ask the court reporter to
16 mark as JE-2 this document.

17 (The document referred to was
18 marked as Defendants' Exhibit JE-2 for
19 identification and attached and made a
02:50PM 20 part of the deposition.)

21 MR. THOMPSON: Thanks. Why don't you keep
22 possession of ours.

23 BY MS. REA:

24 Q So what's been marked as JE-2 is the demand for
02:51PM 25 jury trial filed in United States District Court, Southern

1 record?

2 THE VIDEO TECHNICIAN: This marks the end of
3 media No. 2 in the deposition of Jared -- Jared Edwards in
4 the matter of Jared Edwards versus Keenen Ivory Wayans, et
02:59PM 5 al., in the United States District Court, case number
6 2:10-cv-02231 R(RCX). The time is 2:59 P.M. We're now
7 off the record.

8 (Recess taken.)

9 THE VIDEO TECHNICIAN: This marks the beginning
03:15PM 10 of media No. 3 in the video deposition of Jared Edwards in
11 the matter of Jared Edwards versus Keenen Ivory Wayans et
12 al., in the United States District Court, case number
13 2:10-cv-02231 R(RCX). The time is 3:15 P.M. We're back
14 on the record.

03:15PM 15 BY MS. REA:

16 Q Mr. Edwards, if you could go back and look at
17 what was marked as JE-3. On the top it should say, if I'm
18 correct, "101 Ways How to Know if You're a Groupie."

19 A Uh-huh.

03:16PM 20 Q Okay. Did you draft this document?

21 A I don't recall drafting this one, but I possibly
22 could. These are my jokes.

23 Q Do you know if anyone else could have drafted
24 this document?

03:16PM 25 MR. THOMPSON: Objection. Calls for speculation.

1 THE WITNESS: I'm sure someone could have. I --
2 this isn't my writing in the top corner there, so --

3 BY MS. REA:

4 Q Do you recognize that handwriting?

03:16PM 5 A I recognize it as not being mine.

6 Q But do you recognize who wrote it?

7 A I don't -- I don't know about that, no.

8 Q You produced this document in the case; is that
9 right?

03:17PM 10 A Right, but still I don't know if I -- you know,
11 this was just stuff I had in -- in my -- my folder, my --
12 my stuff that I had; so -- these are my jokes, but I don't
13 remember, you know, necessarily generating this one.

14 Q What folder are you talking about?

03:17PM 15 A To send my stuff that I -- my folder of stuff
16 that I had written.

17 Q What's -- what else is in your folder?

18 A Everything I've written; this book that I wrote
19 and everything else that I wrote.

03:17PM 20 Q Where do you keep your folder?

21 A At my place where I live.

22 Q So you don't know if you wrote this version or
23 not?

24 A Well, I do know that these are my jokes, and so
03:17PM 25 because that these are my jokes, I wrote these, but I

1 A I expected everything I've ever written to turn
2 into something, whether it do or don't. I still expected
3 for something -- for my talent, for my success out of it
4 to happen.

03:36PM 5 Q Do you put Shawn Wayans, Marlon Wayans and Keenen
6 Wayans on everything you write?

7 A I didn't put their names on there.

8 Q Who did?

9 A I'm not sure. I didn't put their names on there.

03:36PM 10 I never put their names on my book. This was a draft, so
11 once it left my hands and it was in the person -- the
12 project manager who handled it, Ahyoung Kim, she handled
13 every document after that. The reason why you see my notes
14 on there, it's something that, once it was given back to
03:36PM 15 me, I had to read over my own jokes again.

16 Q So you never talked to Ahyoung about why Shawn
17 Wayans, Marlon Wayans and Keenen Wayans appeared on this
18 list?

19 A I --

03:37PM 20 MR. THOMPSON: Objection. Misstates his testimony.

21 THE WITNESS: Can you say that again?

22 BY MS. REA:

23 Q So you never talked to Ahyoung Kim about Shawn
24 Wayans, Marlon Wayans or Keenen Ivory Wayans appearing on
03:37PM 25 this document?

1 A I never talked to her about it, no.

2 Q Did you ever talk to her about your name
3 appearing on the storyboard?

03:37PM 4 A I never talked to her about my name being on the
5 storyboard.

6 Q But you guys were friends, right?

7 A Yeah, but even in talking to her, the final say-so
8 came from Shawn and Marlon and Keenen. No one made a
9 decision over them, so if my name was on the -- the mockup
03:37PM 10 board or storyboard or whatever, it's because they -- they
11 okayed it. No one okayed that, but them.

12 Q Were you proud of that?

13 A That I wrote a book and my name was on there?

14 Q That your name was on the storyboard.

03:38PM 15 A That I -- my name was on the storyboard for books
16 I wrote, yes, I was proud of that.

17 Q Did you tell anybody about that?

18 A I told everyone that I could tell that was a
19 friend of mine or family, whatever.

03:38PM 20 Q You never asked Ahyoung what happened with the
21 storyboard?

22 MR. GRAFF: Wasn't it poster board?

23 THE WITNESS: What do you mean I never asked him
24 about it?

03:38PM 25 BY MS. REA:

1 Q Did you ever -- after you saw it in her office,
2 did you ever ask what happened?

3 A I never --

4 MR. THOMPSON: Objection. Vague. Calls for a
03:38PM 5 narrative.

6 BY MS. REA:

7 Q You can answer if you understand the question.

8 A I -- what you're failing to realize is that
9 Ahyoung was the project manager over those things, so, you
03:38PM 10 know, in terms of asking her about it, I didn't necessarily

11 know, I didn't have to, but I'm still kind of confused at
12 what you're trying get to. You're asking me did I ask her
13 about the storyboards for what? I don't --

14 Q We're talking about the lawsuit that you filed --

03:39PM 15 A Right.

16 Q -- and this book, and I'm not sure what to call
17 it, but these documents, these drafts, that you say you
18 wrote of these jokes.

19 A That I did write.

03:39PM 20 Q And there was a storyboard with your name, a
21 pitch board.

22 A Right.

23 Q And, you know, when I use either of those two
24 terms what I'm referring to, correct, the board that
03:39PM 25 had -- was used for pitch of these "101 Ways."

1 A I expected or I assumed or I hoped. I hoped that
2 it would, but I didn't know anything.

3 Q But -- so you hoped it would get published?

4 MR. THOMPSON: Objection. Asked and answered.

03:40PM 5 THE WITNESS: I expected and hoped, or however
6 you want to say that, the project -- that my jokes, my
7 book that I wrote, that something successful or positive
8 would happen with it.

9 BY MS. REA:

03:41PM 10 Q Was there anything that led you to believe that
11 that was more likely to happen than not?

12 A After I had written the jokes and they were all
13 excited over it, you know, Shawn and Marlon made me aware
14 that it would be, you know -- I could possibly have an
03:41PM 15 opportun -- this could be an opportunity for me to get
16 credit and finally be recognized and my talents be seen in
17 a different light.

18 Q Who told you that?

19 A Shawn and Marlon.

03:41PM 20 Q When did they tell you that?

21 A After they, you know, read the jokes and saw it
22 was something that they were interested in.

23 Q Was this before or after you dropped off a draft
24 at --

03:41PM 25 A This was after --

1 A No, but what I can say is that these are my jokes
2 that I wrote.

3 Q And you produced like, for example, the document
4 marked JE-3, the top one on your pile right there?

03:54PM 5 A Right, but that still doesn't mean that I
6 generated this actual. It does mean that I wrote the
7 jokes. It doesn't mean I generated the actual document.

8 Q What means you wrote the jokes?

9 A I wrote every joke, so this is -- these are my
03:54PM 10 jokes. These are my jokes that are in the book, but this
11 actual piece of paper, document, doesn't mean that I
12 generated this.

13 Q Well, how'd you give it to your lawyer to produce
14 in this case?

03:55PM 15 A They were documents that I had, I kept, but these
16 documents could have came from Ahyoung or -- but the jokes
17 are mine, the jokes on the pieces of paper are mine.

18 Q Why do you say it could have come from Ahyoung?

19 A Like I stated earlier, Ahyoung is -- once the
03:55PM 20 jokes left from my hand and Keenen liked them, because she
21 was the person in charge of that project, she kept a file
22 of everything and whenever she needed questions about
23 something, because I wrote them, she e-mailed me and
24 that's why I had copies. I got an e-mail copy of everything.

03:55PM 25 Q Was that before or after you filed your lawsuit?

1 A This was before.

2 Q So why did you ask for a copy of everything
3 before you filed your lawsuit?

4 A This was during the time I was still employed
03:56PM 5 with them, so because it was my book and I was the author
6 and the jokes of the book, anything that happened with
7 them, I was always e-mailed a copy, so, you know, if they
8 needed to understand something, just as of, you know,
9 formal way of doing things, you always send e-mails.

03:56PM 10 Q So you and Ahyoung exchanged e-mails?

11 A She exchanged e-mails, not just with myself, with
12 Shane Miller also, with all the artists.

13 Q So all the people working on the "101 Ways"
14 series?

03:56PM 15 A All the people who worked on it and the person
16 who wrote there, so because I wrote mine, yes, she would
17 send me e-mails.

18 Q Did you ever respond to her e-mails?

19 A I'm sure, I'm sure I did.

03:56PM 20 Q Why did you think you were getting these e-mails?

21 A What do you mean why did I think, because I read
22 them.

23 Q I mean did you think that Marlon and Shawn were
24 working on your book?

03:57PM 25 A I knew that they were interested in my book after

1 I pitched it to them and I knew that they were interested
2 in doing something with it after they had the artists
3 generate a cover for it.

4 Q When did you pitch your book to Shawn and Marlon?

03:57PM

5 A I pitched it to Keenen first when I just had the
6 seed of the idea, no long conversation. I mentioned it to
7 Shawn, and like I said before, he blew it off.

8 Q But you --

9 A -- and --

03:57PM

10 Q -- just said -- go ahead.

11 A Pitched it to Keenen by leaving it at his place.

12 Q What address was that at?

13 A Sunset and Vine.

14 Q So at his office?

03:57PM

15 A That wasn't his office.

16 Q His apartment?

17 A Apartment he shared with Shawn, yes.

18 Q Where did you leave it?

19 A On the kitchen table.

03:57PM

20 Q And you don't have that draft in your possession
21 that you --

22 A I don't have it in my possession.

23 Q When did you pitch it, not just the idea, but the
24 actual book to Shawn and Marlon?

03:58PM

25 A Shawn and Marlon did not get the actual book

1 computer?

2 A I'm not sure. I'd have to -- I can't say right
3 now, but if I find it, I'll let you know.

4 Q Do you back up your documents on a hard drive, an
04:00PM 5 external hard drive?

6 A I have, yes.

7 Q Do you use any service where you back up your
8 computer content externally?

9 A What do you mean service?

04:00PM 10 Q There are some services that create clouds or
11 external storage. Do you use any of those services?

12 A Not that I know of, no.

13 Q So if you back up your documents, did you work on
14 all drafts on that computer?

04:01PM 15 A I worked on all my drafts on that computer.

16 Q Why did you need Ahyoung to e-mail you copies of
17 what you worked on if you saved all drafts on your computer?

18 A Because once they were interested in the project,
19 in my -- my book that I wrote, once they were interested
04:01PM 20 in it, then it became part of what they were going to do
21 with, you know, the series or that's what I -- you know,
22 so because she was involved and she headed that, that's
23 why. She had a copy of it. She had a copy and every time
24 there would be, you know, they'd have their own notes or
04:01PM 25 wanted to get the artist on it, just as a procedure to be,

1 you know, formal with things, she would send them to the
2 person who wrote it --

3 Q Was it --

4 A -- the same as she sent to Shane for the one that
04:01PM 5 he wrote.

6 Q How did it come that you wrote a separate book
7 that's part of a series at the place where you're working
8 and Shane Miller wrote a separate book at the place you're
9 working, but you didn't know Shane was doing that?

04:02PM 10 A Because, like I stated earlier, Shane wrote his
11 book after me and after he read my jokes. I wrote my book
12 first and I wrote it as a means, like I said before, for
13 me to progress myself in this business, let what talent I
14 have known, and whether I pitched it with them or someone
04:02PM 15 outside of them.

16 Q Did you pitch it to anyone outside of them?

17 A I pitched it, but --

18 Q To who?

19 A Pitched it to other people.

04:02PM 20 Q Who?

21 A Xavier Cook.

22 Q Who worked at Wayans Brothers, correct?

23 A He didn't work at Wayans Brothers. He was a
24 writer who they freelanced.

04:02PM 25 Q Was he a publisher?

1 BY MS. REA:

2 Q And it says, "I am e-mailing in regards to my
3 jokes that are in the book, '101 Ways How to Know You're a
4 Golddigger.'" Is that correct?

04:18PM 5 A Uh-huh.

6 MR. THOMPSON: Well, no, no, no, no. Misstates
7 the record. Can you read the entire e-mail from the first
8 page --

9 THE WITNESS: Oh --

04:18PM 10 MR. THOMPSON: -- please, so the record is not
11 distorted. I'm asking you, Ms. Rae, if you're going to
12 read this out loud as the beginning of the e-mail, you
13 have an obligation to read it from the beginning where it
14 says, "Hey, Ahyoung.

04:18PM 15 BY MS. REA:

16 Q So on page JE-118, it says, "I'm e-mailing in
17 regards to my jokes that are in the book '101 Ways to Know
18 You're a Golddigger,'" correct?

19 A That's what that says.

04:19PM 20 Q Right. And then it goes on to say, "While at
21 Wayans Brothers, slash, SMK, employed as a personal
22 assistant, you and I discussed every joke I wrote on many
23 occasions as a means for advancement and to earn a much
24 more creative position."

04:19PM 25 Is that what that says?

1 MR. THOMPSON: Objection. The document speaks
2 for itself.

3 THE WITNESS: Yes, the document says that.

4 BY MS. REA:

04:19PM 5 Q Okay. And it says, "As you may know, I left the
6 Wayans Brothers/SMK prior to" -- and there's a little
7 typo -- "to any of this ever happening. While to my
8 surprise and much disappointment and without my knowledge
9 of any deal ever being made, my permission given or any
04:19PM 10 agreement agreed on my behalf, I notice that the book with
11 my jokes has just been released in stores. Please e-mail
12 me back as to why or how this could happen without me
13 knowing. Thank you, Jared R. Edwards."

14 A Uh-huh.

04:20PM 15 Q And then on page JE-117 of the document marked as
16 JE-10, the top it says from Jared; is that correct?

17 A What part?

18 MR. THOMPSON: That misstates the record and
19 misstates -- it misstates the document that you are asking
04:20PM 20 this witness -- witness questions about.

21 BY MS. REA:

22 Q On JE-117 --

23 A Uh-huh.

24 Q -- where it starts with -- it's about halfway
04:20PM 25 through the page -- it says, "Original message." Do you

1 exited the proceedings.)

2 THE VIDEO TECHNICIAN: The time is 5:21 P.M.

3 We're back on the record.

4 BY MS. REA:

05:21PM 5 Q Mr. Edwards, did you ever meet with anyone from
6 St. Martin's Press, to your knowledge?

7 A No.

8 Q Did you ever meet with a woman named Elizabeth
9 Byer (phonetic)?

05:21PM 10 A Don't recall meeting with Elizabeth Byer.

11 Q Did you ever have any telephone conferences with
12 anyone from St. Martin's Press?

13 A No, I don't recall.

14 Q You don't recall or you didn't?

05:21PM 15 A Don't recall having them --

16 Q Okay.

17 A -- phone conversations, with anyone from
18 St. Martin's Press.

19 Q If you had had a conversation with anyone with
05:21PM 20 St. Martin's Press, would you have kept notes about that
21 meeting?

22 MR. GRAFF: Objection. Calls for speculation.

23 THE WITNESS: I don't recall having a phone
24 conversation with anyone from St. Martin's Press.

05:22PM 25 BY MS. REA:

1 Q Do you know the name of any person at St. Martin's
2 Press that worked on the "101 Way" series?

3 A Don't recall the name. I don't. I never talked
4 with anyone from St. Martin's Press, so --

05:22PM 5 Q So you never -- go ahead.

6 A -- so I wouldn't know any names.

7 Q Did you ever exchange any e-mails with anyone
8 from St. Martin's Press?

9 A I don't recall exchanging e-mails with anyone
05:22PM 10 from St. Martin's Press.

11 Q Have you kept all the e-mails related to the "101
12 Way" series that you have in your possession?

13 MR. GRAFF: Objection. Vague.

14 THE WITNESS: Everything that I have, my
05:22PM 15 attorneys have.

16 (Brief interruption.)

17 BY MS. REA:

18 Q Did you ever -- did you ever send any texts to
19 anyone at St. Martin's Press, to your knowledge?

05:23PM 20 A Don't recall ever sending any text to anyone from
21 St. Martin's Press.

22 Q Did you ever sign a contract with St. Martin's
23 Press?

24 A Did I ever what?

05:23PM 25 Q Sign a contract with St. Martin's --

1 A No, I never signed a contract with --

2 Q Did they ever send you any letters?

3 MR. GRAFF: Vague. Objection.

4 THE WITNESS: Don't recall ever getting any

05:23PM 5 letter from St. Martin's Press.

6 BY MS. REA:

7 Q Do you know where St. Martin's Press offices are?

8 MR. GRAFF: Objection. Ambiguous.

9 THE WITNESS: What do you mean, like, location or

05:23PM 10 where at?

11 BY MS. REA:

12 Q Location, physically located.

13 A I just know that they in New York. I don't know
14 where.

05:23PM 15 Q Have you ever been to their offices?

16 A No.

17 Q Do you know who Keenen Ivory Wayans' talent agent
18 is?

19 MR. GRAFF: Objection. Vague as to time.

05:24PM 20 THE WITNESS: I haven't worked for them in years.

21 I don't know who his agent is.

22 BY MS. REA:

23 Q Okay. When you worked for them in 2006, do you
24 know who his talent agent was?

05:24PM 25 A They had a couple, so I'm not sure.

1 the "101 Way" series?

2 MR. GRAFF: Objection. Vague.

3 THE WITNESS: I was never asked to call them about
4 that.

05:26PM 5 BY MS. REA:

6 Q Were you ever asked to call them about any products
7 that the Wayans Brothers were licensing?

8 MR. GRAFF: Objection.

9 THE WITNESS: I don't recall being asked none of
05:26PM 10 that, no.

11 BY MS. REA:

12 Q Has St. Martin's Press made any promise to you
13 regarding the "101 Ways to Know" series?

14 MR. GRAFF: Objection. Vague.

05:26PM 15 THE WITNESS: What do you mean? Promising what?

16 BY MS. REA:

17 Q Do you feel like they've promised you anything?

18 A Since when?

19 Q Ever.

05:26PM 20 A Not -- they never made anything -- a promise to
21 me, no.

22 Q Do you feel like Keenen Wayans promised you
23 anything with respect to the " 101 Way" series?

24 MR. GRAFF: Objection. Vague. Calls for
05:27PM 25 speculation. Calls for a narrative. Assumes facts not in

1 evidence.

2 THE WITNESS: Say that question again.

3 BY MS. REA:

4 Q Do you feel like Keenen Ivory Wayans promised you
05:27PM 5 anything with respect to the "101 Way" series?

6 MR. GRAFF: Same objections.

7 THE WITNESS: Wasn't so much now that he promised
8 me anything, but I (sic) was made very clear that I would
9 get credit on this book that I wrote.

05:27PM 10 BY MS. REA:

11 Q Do you feel like Marlon promised that you would
12 get credit on this book that you wrote?

13 A Marlon and Shawn, because they handled it, made
14 it clear that I would get credit for the book that I
05:27PM 15 wrote --

16 Q Did they tell you --

17 A -- the jokes I wrote.

18 Q Did they tell you you'd get anything else besides
19 a credit?

05:27PM 20 A No. I -- it was the only thing discussed at the
21 time and after that is when I left.

22 Q When did you have that discussion?

23 MR. GRAFF: Objection. Vague.

24 THE WITNESS: Can't remember the exact time, but
05:28PM 25 it was around the time that -- after I finished writing

1 the book and it was discussed around that time, some part.

2 BY MS. REA:

3 Q Was that in the offices?

4 A Can't --

05:28PM 5 MR. GRAFF: Objection. Vague.

6 THE WITNESS: Don't exactly know where it was,
7 but it was a clear understanding that I would get credit
8 which is why my name appeared on all the documents, as
9 well as the cover for it.

05:28PM 10 BY MS. REA:

11 Q Did you talk about it on more than one occasion
12 with Shawn and Marlon Wayans?

13 MR. GRAFF: Objection. Talk about what?

14 THE WITNESS: Yeah, talk about what?

05:28PM 15 BY MS. REA:

16 Q That you would get credit on the book.

17 A Didn't have to be talked about more than once
18 because my name appeared on all the documents, as well as
19 the cover.

05:28PM 20 Q The cover of what?

21 A The books I wrote, the jokes I wrote.

22 Q Were all the books written at the time these
23 covers were made?

24 MR. GRAFF: Objection. Calls for speculation.

05:29PM 25 Assumes facts not in evidence.

1 THE WITNESS: You can't have the illustration
2 without the joke, so, yes, I wrote all the books. All the
3 books I wrote, the text was written.

4 BY MS. REA:

05:29PM 5 Q So when you saw that storyboard in Ahyoung's
6 office, the pitch board that we've been talking about --

7 A Those jokes already existed.

8 Q All the jokes existed.

9 MR. THOMPSON: Objection. Vague.

05:29PM 10 THE WITNESS: All the jokes from my book. I
11 wrote all the texts from my book, they existed.

12 BY MS. REA:

13 Q And what are those books, again, to be clear?

14 A "Golddigger" --

05:29PM 15 MR. GRAFF: Objection. Asked and answered.

16 THE WITNESS: -- and "Ghetto Kids Party."

17 BY MS. REA:

18 Q Uh-huh.

19 A And "Ghetto Momma."

05:29PM 20 Q What about "101 Ways to Know You're a Weed Head"?
21 Did you write that book?

22 A I did not write that book.

23 Q What about "101 Ways to Know You're Having a
24 Ghetto Christmas"?

05:30PM 25 A Did not write that book.

1 Q What about "101 Ways to Know It's Time to Get Out
2 of Your Momma's House"?

3 A Did not write --

4 MR. GRAFF: Objection. Vague as to what about
05:30PM 5 it.

6 BY MS. REA:

7 Q Did you assist in the writing process of any
8 other book besides the three you just mentioned?

9 MR. GRAFF: Objection. Vague with respect to the
05:30PM 10 word "assist."

11 THE WITNESS: I only wrote on my book and my book
12 only. Those jokes are all my jokes. I wrote them.

13 BY MS. REA:

14 Q I understand. Did you write jokes for any other
05:30PM 15 book in the 101 --

16 A I didn't write jokes for any of the other books.

17 Q Is there anything else that Shawn or Marlon did
18 that led you to believe that you would get credit on "101
19 Ways to Know You're a Golddigger"?

05:31PM 20 MR. GRAFF: Objection. Vague.

21 THE WITNESS: I put in all my -- make sure my
22 name's on the book, along with telling me I would get
23 credit.

24 BY MS. REA:

05:31PM 25 Q When did you know your book wouldn't have your

1 credit on it?

2 MR. GRAFF: Objection. Asked and answered.

3 THE WITNESS: When I saw it in the store and it
4 didn't have my name on there.

05:31PM 5 BY MS. REA:

6 Q When you left St. Martin -- strike that.

7 When your employment ended with the Wayans
8 Brothers in 2006, we talked very briefly about you doing
9 stand-up with Shawn, traveling with him in Vegas.

05:31PM 10 A And other places, right.

11 Q Was that before or after you had been terminated
12 by Marlon?

13 MR. GRAFF: Objection.

14 THE WITNESS: I was never terminated by Marlon.

05:32PM 15 I quit.

16 BY MS. REA:

17 Q You guys had a mutual understanding, right?

18 A No. You said my last employment with them, I
19 quit. There was no mutual understanding.

05:32PM 20 Q When was that?

21 A It was sometime in '06, in October, somewhere
22 around that time.

23 Q Where did you quit?

24 A I quit by sending him a message saying I was
05:32PM 25 quitting.

1 Q Was it an e-mail?

2 A Yes.

3 Q Did you send it by text?

4 A Sent it by e-mail.

05:32PM 5 Q What e-mail address did you use?

6 A Can't recall off the top of my head, but I'm sure
7 you have it.

8 Q Did you e-mail anybody else saying that you were
9 quitting?

05:32PM 10 MR. GRAFF: Objection. Vague as to time.

11 THE WITNESS: I can't recall everyone I told, but
12 the most important person was to tell him. It didn't matter.

13 BY MS. REA:

14 Q Did he write back to you?

05:33PM 15 A Yes.

16 Q What did he say?

17 A Don't know verbatim, but I'm sure you have them.

18 Q Do you remember gist of the --

19 A He told me I was out of line for taking it upon
05:33PM 20 myself to quit, I don't call the shots, that's something
21 he do.

22 Q Why did you quit?

23 A I was fed up with being berated, belittled,
24 unappreciated, talked down upon, yelled at, and just flat-out
05:33PM 25 treated bad in terms of work and everything. I wasn't

1 A No.

2 Q Did you tell anyone else besides Marlon that you
3 were going to not come into the office?

4 A I told Shawn and I continued to work with him
05:38PM 5 after that.

6 Q Where did you tell Shawn?

7 A Can't recall if it was a phone call. I'm sure it
8 was. Can't recall if it was a phone call or via text or
9 e-mail or whatever.

05:39PM 10 Q Before that e-mail was sent to Marlon, in that
11 time period when you're still going into the office at
12 Wayans Brothers, what stage were the "101 books" in?

13 MR. GRAFF: Objection.

14 THE WITNESS: Say that again.

05:39PM 15 BY MS. REA:

16 Q So I want to focus your attention on the time
17 before the month, let's say, before you send this e-mail
18 to Marlon.

19 A Before I quit --

05:39PM 20 Q One month. So focused on that time, what stage
21 were the "101 books" in?

22 MR. GRAFF: To the extent that you recall at the
23 time that she's specifying.

24 THE WITNESS: They were all in the stage of being
05:39PM 25 illustrated. My jokes were being illustrated.

1 BY MS. REA:

2 Q Do you remember specifically with "101 Ways to
3 Know You're a Golddigger" do you know what stage that book
4 was in?

05:39PM 5 A There were illustrations that had already been
6 illustrated.

7 Q Do you remember how many?

8 A Can't recall at this point how many, and since
9 the book has come out, they could have changed that, so I
05:40PM 10 don't know.

11 MS. REA: I'll have the court reporter mark as
12 JE-13 (sic).

13 (The document referred to was
14 marked as Defendants' Exhibit JE-13 for
15 identification and attached and made a
16 part of the deposition.)

17 BY MS. REA:

18 Q Mr. Edwards, I'll represent to you that the
19 document marked as JE-13, bates stamped JE-010 through
05:40PM 20 JE-113 --

21 A Uh-huh.

22 Q -- is a copy of a book entitled, "101 Ways to
23 Know You're a Golddigger." It was produced on your behalf
24 by your attorneys in connection with this lawsuit.

05:41PM 25 A Okay.

1 A I was paid by --

2 MR. GRAFF: Objection. Vague.

3 THE WITNESS: I was paid by Wayans Brothers.

4 BY MS. REA:

06:27PM 5 Q Did the producer or any other company pay you
6 directly for that work?

7 A I was paid by Wayans Brothers, and I believe also
8 to cover for -- per diem and all those things, I was paid
9 individually by Next to Last and Baby Way.

06:28PM 10 Q Did you get mileage?

11 A No mileage.

12 Q Did you ever sit in a writing --

13 A I wasn't driving out there.

14 Q Okay.

06:28PM 15 A Well, I did drive, but I wasn't getting mileage.

16 Q You did drive as part of your job?

17 A Yes, I would drive Shawn around.

18 Q Did you ever sit in the writers' room on Little
19 Man?

06:28PM 20 A I was paid to do punch-up, so, yes, I did.

21 Q What is a writers' room?

22 A It wasn't necessarily a writers' room. If you
23 want to say writers' meeting at the time. There was no
24 writers' room.

06:28PM 25 Q Okay, so when -- writers would get together to

1 know what you mean by -- was I satisfied, probably not.

2 Q Did you ever ask Marlon for your job back?

3 MR. GRAFF: Objection. Vague as to time.

4 THE WITNESS: No.

06:42PM 5 BY MS. REA:

6 Q Did you ever ask Shawn what was going to happen
7 with you working on the "101 Way" series?

8 MR. GRAFF: Objection. Vague as to time.

9 THE WITNESS: Don't recall ever having that
06:42PM 10 conversation because I just left.

11 BY MS. REA:

12 Q But you never asked Shawn about it? Not Marlon,
13 sorry.

14 A Saying when I just left it was -- it was a
06:43PM 15 conversation having (sic) until I left. Like once I left,
16 I had no conversations with anyone about it, none of them.

17 Q From the time you say you quit working with
18 Marlon, how many shows do you think you traveled with
19 Shawn on?

06:43PM 20 A Can't recall all of them. I don't know.

21 Q More than five?

22 A I would be guessing. I can't recall.

23 Q More than ten?

24 A I would be guessing. I can't recall.

06:43PM 25 Q Well, it's more than one.

1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.
3

4 I, Stefanie L. Ocker, C.S.R. No. 10740, in
5 and for the State of California, do hereby certify:

6 That prior to being examined, the witness named
7 in the foregoing deposition was by me duly sworn to
8 testify to the truth, the whole truth, and nothing but the
9 truth;

10 That said deposition was taken down by me in
11 shorthand at the time and place therein named and
12 thereafter reduced to typewriting under my direction, and
13 the same is a true, correct, and complete transcript of
14 said proceedings;

15 That if the foregoing pertains to the original
16 transcript of a deposition in a Federal Case, before
17 completion of the proceedings, review of the transcript
18 { } was { } was not required.

19 I further certify that I am not interested in the
20 event of the action.

21 Witness my hand this 8th day of Dec.,
22 2010.

23 Stefanie L. Ocker
24 Certified Shorthand Reporter
25 for the State of California

REDACTED

"Success is just a meal away so please stuff yourself".....By Me

-----Original Message-----

From: Ahyoung <ahyoungk74@yahoo.com>

To: Jared <jredwords@aol.com>

Sent: Fri, Jun 12, 2009 3:03 pm

Subject: Re: My 101 How To Know You're A Golddigger Jokes

Hi Jared,

Wow, sorry to hear that! I do remember you writing the Gold Digger jokes. Since I have left the company back in 7/2007, I have had little knowledge of what the Wayans were doing with the 101 books. But I can't believe they put that one out without even letting you know or putting your name on it! I believe their deal with St. Martins Press was for 3 books and one of the first 3 the publisher chose was the 101 ways to know you're and Gold Digger. To my understanding and recollection, you did write that one.

Again, I'm so sorry to hear that they have released the book without any credit due to you. That is horrible and not right.

I hope you find resolution from this.

Ahyoung

-----Original Message-----

From: Jared

To: AHYOUNGK74@YAHOO.COM

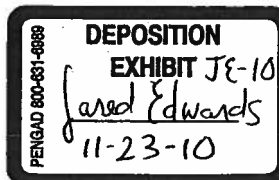
To: Jared

To: ahyoung-joah kim

Subject: My 101 How To Know You're A Golddigger Jokes

Sent: Jun 12, 2009 11:32 AM

Hey Ahyoung,



JE_117

I am emailing in regards to my jokes that are in
the
book "101 Ways How To Know You're A Golddigger." While at Wayans
Brothers/SMK employed as a Personal Assistant you and I discussed every
joke I wrote on many occasions as a means for advancement and to earn a
much more creative position. As you may know I left Wayans Brothers/SMK
prior to to any of this ever happening. Well to my surprise and much
disappointment and without my knowledge of any deal ever being made, my
permission given or any agreement agreed on my behalf. I noticed that
the book with my jokes has just been released in stores. Please email
me back as to why or how this could happen without me knowing.

Thank You

Jared R. Edwards

Sent via BlackBerry from T-Mobile